

**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

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Case No. _____

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

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TABLE OF CONTENTS

I.	Q LINK’S UNIVERSAL SERVICE OFFERING	2
A.	Company Overview	2
B.	Proposed Lifeline and Link-Up Offerings	3
C.	Plan Enrollment	6
D.	Prevention of Waste, Fraud and Abuse.....	8
II.	THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCS.....	9
A.	The ETC Designation Request Is Consistent with Recent Commission Precedent.....	10
III.	Q LINK SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC	10
A.	Q Link Will Provide Service Through Resale And Its Own Facilities	11
B.	Q Link Is a Common Carrier.....	12
C.	Q Link Will Provide All Required Services and Functionalities	13
D.	Q Link Will Advertise the Availability of Supported Services	16
E.	Q Link Requests Designation Throughout its Service Area in Missouri.....	17
F.	Service Commitment Throughout the Proposed Designated ServiceArea.....	18
G.	Network Improvement Plan.....	18
H.	Ability to Remain Funcional in Emergency Situations	19
I.	Commitment to Consumer Protection and Service Quality.....	20
J.	Local Usage Requirement.....	20
K.	Equal Access Requirement	21
L.	Q Link Will Comply with Certification and Verification Requirements.....	21
M.	Q Link Will Comply With All Regulations Imposed By The Commission	22
IV.	DESIGNATION OF Q LINK AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST	23
A.	The Benefits of Competitive Choice.....	25
B.	Impact on the Universal Service Fund.....	26
V.	ANTI-DRUG ABUSE CERTIFICATION	26
VI.	CONCLUSION.....	27

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COMES NOW Q Link Wireless LLC (“Q Link” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹ and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Missouri Public Service Commission (“Commission”), including 4 CSR 240-3.570, hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri. Q Link seeks ETC designation solely to provide Lifeline and Link-Up service to qualifying Missouri households; it will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high cost areas.³ As demonstrated herein, Q Link meets all the statutory and regulatory requirements for designation as an ETC in the State of Missouri. Rapid grant of Q Link’s request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline and Link-Up services to low-income Missouri

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ Given that Q Link seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company. Q Link currently has applications for ETC designation pending with Georgia, Maryland and Mississippi; no such petitions have been denied.

residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this application for ETC designation.

I. Q LINK'S UNIVERSAL SERVICE OFFERING

A. Company Overview

1. Q Link is a Delaware Limited Liability Company.⁴ Its principal office is located at 499 Sheridan Street, Suite 300, Dania, Florida 33004. A copy of Q Link's certificate from the Missouri Secretary of State authorizing it to do business in Missouri is attached hereto as **Exhibit 1**. As provided in section 240-3.570(3)(F), Q Link will notify the Commission in the event of a change in the company-designated contacts.

2. Q Link is a provider of commercial mobile radio service ("CMRS") throughout the United States, and provides prepaid wireless telecommunications services to consumers by using the Sprint Nextel ("Sprint") network on a wholesale basis to offer nationwide service. In addition to using Company-owned facilities to provide service, Q Link obtains from Sprint the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator ("MVNO").

3. Please direct copies of all correspondence, pleadings, and orders in this proceeding to the following:

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⁴ Q Link was organized in the State of Delaware on August 25, 2011.

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4. Q Link's prepaid wireless services that are affordable and easy to use are attractive to low-income and lower-volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. Q Link offers consumers simple and affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Given its pricing and marketing strategy and the demographics of other, similar MVNOs' customers, Q Link anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. Q Link does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

5. By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or were previously ignored by traditional carriers, Q Link will expand the availability of wireless services to many more consumers, which is the principal reason that Congress created the universal service program.

B. Proposed Lifeline and Link-Up Offerings

6. Q Link has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. §

54.101(a)) throughout Missouri. Q Link will provide Lifeline and Link-Up services to qualifying customers requesting this service throughout Missouri pursuant to the universal service program and in accordance with 47 C.F.R. § 54.202(a)(1). Q Link intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice usage at all price points.

i. **Lifeline Offering.** The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other Q Link prepaid customers, with one notable exception: prepaid Lifeline services will be free of charge. As Exhibit 2 demonstrates, the Company's Lifeline service will provide customers with one of the following three (3) Lifeline Plans:

- a. Plan 1: 68 Monthly Minutes. Under Plan 1, eligible customers enjoy 68 anytime minutes that rollover and free international long distance.⁵ Text messaging is at the rate of one-third of one minute (3 texts = 1 minute).
- b. Plan 2: 125 Monthly Minutes. Under Plan 2, eligible customers enjoy 125 anytime minutes that rollover. Text messaging is at the rate of one minute (1 text = 1 minute).
- c. Plan 3: 250 Monthly Minutes. Under Plan 3, eligible customers enjoy 250 anytime minutes. Minutes do not rollover. Text messaging is at the rate of one minute (1 text = 1 minute).

⁵ If you are on Plan 1, there is no additional charge for international long distance to countries designated at www.qlinkwireless.com.

Customers have the capability of purchasing additional bundles of minutes in denominations as low as \$9.99, \$19.99, \$29.99, and \$59.99.⁶ Airtime replenishment cards will be made available at retail outlets frequented by low income customers throughout the Company's Service Area. In addition to free voice services, all of Q Link's Lifeline plans will include a free handset and the following Custom Calling features: Caller ID, Call Waiting, and Voicemail. Customers may use their minutes to place domestic long distance calls at no additional charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Calls to Q Link customer service are also free.

Q Link will also offer Lifeline customers the option of applying a \$13.50 discount towards the Company's lowest retail rate plan in lieu of receiving the free minutes. Q Link's discounts are consistent with the federal plan, pursuant to Section 54.403 of the FCC's rules and 4 CSR 240-3.570(2)(A)7.

Customers can change their plan on their monthly plan date, without penalty, should they determine that another plan better meets their needs or if their needs change. Q Link does not impose burdensome credit checks, long-term service contracts, or roaming charges

ii. **Link-Up Offering.** Link-Up Assistance is in the form of a "reduction in the carrier's customary charge for commencing telecommunications service for a single telecommunications connection" and "shall be half of the customary charge or \$30.00, whichever is less".⁷ Consistent with FCC requirements, Q Link will use Link-Up support to reduce the Company's \$60.00 standard wireless activation charge by \$30.00. Qualifying subscribers may request a deferred payment schedule for the remaining installation charges, thus allowing subscribers to obtain service without being required to pay any fees to activate service

⁶ \$9.99 = 50 minutes, \$19.99 = 120 minutes, \$29.99 = 200 minutes, and \$59.99 = 450 minutes.

⁷ 47 C.F.R. § 54.411(a)(1).

with Q Link. As such, there is no up-front connection charge applicable to Q Link Lifeline and Link-Up customers.

7. Attached hereto as **Exhibit 2** is a summary table of the Company's proposed Lifeline and Link-up service offerings. Customers may use their minutes to place domestic long distance calls at no additional charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. As Exhibit 2 demonstrates, the Company's Lifeline and Link-up offerings will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of eligible customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without a the burden of credit checks or service contracts. Q Link's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

8. Within thirty days of being designated an ETC by the Commission, Q Link will make an informational filing with the Commission describing all of its service offerings pursuant to 4 CSR 240-3.570(3)(D). Q Link will update this filing with the Commission if its service offerings are amended.

9. Q Link will not collect a deposit from a Lifeline subscriber is the consumer voluntarily elects toll limitation service, and will not charge a Lifeline subscriber a monthly number portability charge, pursuant to Sections 54.401(c) and (e), respectively, of the FCC Rules.

C. Plan Enrollment

10. Customers interested in obtaining information on the Lifeline program will be

directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline and Link-Up service plans, including a detailed description of the programs and state-specific eligibility criteria. Customers may then request that an enrollment form be mailed to them, or they can download a form from the internet. Q Link's proposed enrollment form, which accords with 4 CSR 31.050(3)(D), is attached hereto as **Exhibit 3.**

11. Q Link verifies customer eligibility, has a procedure for documentation received from customers, and has in place a continued eligibility verification procedure. Applicants must complete the enrollment form, which will include a place where applicants must attest and certify under penalty of perjury that they satisfy the requisite eligibility criteria. In addition, each applicant is required to certify under penalty of perjury, at the time of application and annually thereafter, that the applicant or a dependent residing in its household currently receives benefits from a qualifying low-income program and that the applicant is not currently enrolled in another Lifeline program. If not applying in person, the applicant must return the signed enrollment form and all supporting documentation to the address provided by Q Link.

12. Upon completion of the enrollment form, Q Link verifies that the applicant does not exist within Q Link's customer base utilizing several factors, including but not limited to the name, address, phone number, email address, or Ip Address of the computer or device the applicant used to apply. All applications are scanned into Q Link's database and attached to the customer's profile and account records. All recorded calls are stored and attached to the customer's records.

13. Additionally, the applicant is cross-checked using Intelius, DOTS, and other information services to verify the accuracy of information provided. The applicant must provide

the last four digits of its social security number to help the verification using Intelius, DOTS, and other information services. The applicant's household is verified using the USPS database verification to ensure the address and type of dwelling (single family, multifamily, non-commercial address) are correct. Q Link contacts the applicant via a phone number, if provided, or email address, if no phone number is provided, to ensure the accuracy of information provided.

14. Q Link's handset is shipped only to the address provided on the application to ensure validity and establish the local voice service discounts are limited to one per household per USAC rules. The applicant must also verify that no other person in the household is participating in the Lifeline program.

15. Upon 12 months of service, Q Link contacts the customer and re-verifies that the customer still participates in one of the qualifying low-income programs.

16. Processing and verification of applications, including review of all application forms and relevant documentation, will be performed under the Company's supervision by managers experienced in the administration of the Lifeline and Link-Up programs.

17. Q Link will continue to comply with all local, state, and FCC verification procedures in all states that mandate state Lifeline support.

D. Prevention of Waste, Fraud and Abuse

18. Q Link recognizes the importance of safeguarding the USF. Therefore, the Company has implemented the following 60-day non-usage policy in an effort to avoid waste, fraud, and abuse of the program. If no usage appears on a Q Link Lifeline customer's account during any continuous 60-day period, the Company will promptly notify the customer that the customer is no longer eligible for Q Link Lifeline service subject to a 30-day grace period.

During the 30-day grace period, the customer's account will remain active, but Q Link will engage in outreach efforts to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the grace period, Q Link will promptly deactivate Lifeline services and cease to seek reimbursement from the USF for that customer. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

II. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs

19. Section 214(e)(2) of the Act provides state public utility commissions with the "primary responsibility" for the designation of ETCs.⁸ Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.⁹ Therefore, the Commission has the authority to designate Q Link as an ETC. Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier, including any requesting wireless carrier.¹⁰ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). Q Link recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an

⁸ 47 U.S.C. § 214(e)(2).

⁹ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) ("USF Order").

¹⁰ See e.g., *In the Matter of Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Lifeline and Link Up Service to Qualified Households*, Case No. TA-2009-0327, Order, (Eff. September 5, 2009) ("TracFone ETC Order").

ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services.

20. As discussed below, Q Link has the capability to provide some of the supported services using its own facilities, and will thus fulfill the requirement that it provide service using a combination of its own facilities and resale of another carrier's services. A copy of Q Link's wireless network schematic is attached hereto as **** HIGHLY CONFIDENTIAL ** Exhibit 4**. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant Q Link's request for designation as an ETC throughout the State of Missouri.

A. The ETC Designation Request Is Consistent with Recent Commission Precedent

21. Q Link's request for ETC designation to participate in the Lifeline and Link-Up programs is consistent with the Commission's recent designation of TracFone as an ETC.¹¹ In its decision, the Commission determined that TracFone satisfied all of the necessary eligibility requirements and that designation of a prepaid wireless provider as an ETC would serve the public interest. Q Link requests that the Commission expeditiously process its ETC Application so that it can quickly commence providing qualifying low-income Missouri households with affordable USF-supported wireless services during these challenging economic times for all state residents. Designation of Q Link as an ETC would further competition for wireless Lifeline and Link-Up services and would offer eligible consumers an additional choice of providers for accessing telecommunications services, representing a significant step towards ensuring that all low-income consumers share in the many benefits associated with access to wireless services.

III. Q LINK SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

22. Section 254(e) of the Act provides that "only an eligible telecommunications

¹¹ See *TracFone ETC Order*.

carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.¹² Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services. Applicants also must commit to advertise the availability and rates of such services.¹³ As detailed below, Q Link satisfies each of the above-listed requirements.

A. Q Link Will Provide Service Through Resale And Its Own Facilities

23. Q Link, in its provision of wireless services, will rely on a combination of resold services which the Company will obtain from underlying wireless providers that currently operate their own networks, as well as Company-owned facilities, thus allowing Q Link to meet 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”.¹⁴ Q Link’s facilities provide the Company the ability to route operator services, interexchange services and directory assistance services, which are among the supported services.

24. Currently, there is no state or federal definition or requirement as to the number of, or the amount of, the supported services that an ETC must offer via its “own facilities.” Additionally, Federal law does not require any particular level of facilities. The FCC stated in its Universal Service Order, 12 FCC Rcd 8853, FCC 97-157 (“USF Order”), at para. 169 that:

¹² *USF Order*, at 8858-59, ¶ 145.

¹³ *See* 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)(2); 47 C.F.R. § 54.405(b); 4 CSR 240-3.570(2)(A)6.

¹⁴ *See* 47 U.S.C. § 214(e)(1)(A).

We adopt the Joint Board’s analysis and conclusion that a carrier need not offer universal service wholly over its own facilities in order to be designated as eligible because the statute allows an eligible carrier to offer the supported services through a combination of its own facilities and resale. Although the Joint Board did not reach this issue, we find that the statute does not dictate that a carrier use a specific level of its “own facilities” in providing the services designated for universal service support given that the statute provides only that a carrier may use a “combination of its own facilities and resale” and does not qualify the term “own facilities” with respect to the amount of facilities a carrier must use. For the same reasons, we find that the statute does not require a carrier to use its own facilities to provide each of the designated services but, instead, permits a carrier to use its own facilities to provide at least one of the supported services.

25. 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*”¹⁵ (emphasis added). The Communications Act’s definition of “network element” matches that of the FCC and defines a “network element” as “a facility or equipment used in the provision of a telecommunications service. Such term also includes features, functions, and capabilities that are provided by means of such facility or equipment, including subscriber numbers, databases, signaling systems, and information sufficient for billing and collection or used in the transmission, routing, or other provision of a telecommunications service.”¹⁶ All facilities-based carriers have and use network elements.¹⁷

B. Q Link Is a Common Carrier

26. CMRS providers like Q Link are treated as common carriers for regulatory

¹⁵ See 47 C.F.R. § 54.101; 47 C.F.R. § 54.201(e).

¹⁶ See 47 U.S.C. § 153(29).

¹⁷ Only ILEC network elements can be designated as “unbundled” under 47 U.S.C. § 251(c)(3) using the criteria in 47 U.S.C. § 251(d)(2), but all facility-based carriers, including nondominant wireline and wireless carriers also have “network elements.”

purposes.¹⁸

C. Q Link Will Provide All Required Services and Functionalities

27. Q Link offers, or will offer upon designation as an ETC in Missouri, all of the services and functionalities required by 4 CSR 240-3.570(3)(C) and Section 54.101(a)(1)-(9) and Section 54.202(a) of the FCC's Rules (47 C.F.R. § 54.101(a) and 47 C.F.R. § 54.202(a)) including the following:

1. Voice Grade Access to the Public Switched Telephone Network

28. Q Link provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from Sprint. Bandwidth for this voice-grade access is at minimum between 300 and 3,000 MHz as required by FCC rules.¹⁹

2. Local Usage

29. As part of the voice grade access to the PSTN, an ETC must provide local calling services to its customers. The FCC has determined that a carrier satisfies the local usage requirements when it offers customers rate plans containing varying amounts of local usage.²⁰

Q Link offers a variety of rate plans that provide its customers with local usage capabilities included within the flat per minute or per month rate.

¹⁸ *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services *and resellers of such services*." (emphasis added)).

¹⁹ *See* 47 U.S.C. § 54.101(a)(1).

²⁰ *See e.g., Farmers Cellular, Inc.*, CC Docket No. 96-45, Memorandum Opinion and Order, 18 FCC Rcd 3848, 3852 ¶ 9 (2003); *Pine Belt Cellular, Inc. and Pine Belt PCS, Inc.*, CC Docket No. 96-45, Memorandum Opinion and Order, 17 FCC Rcd 9589, 9593 ¶ 10 (2002); *Western Wireless Corp., Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Rcd 48, 52 ¶ 10 (2000).

3. Dual Tone Multi-Frequency Signaling or its Functional Equivalent

30. Q Link provides dual tone multi-frequency (“DTMF”) signaling to expedite the transmission of call set up and call detail information throughout the network. All wireless handsets offered for sale by the Company are DTMF-capable.

4. Single-Party Service or its Functional Equivalent

31. “Single-party service” means that only one party will be served by a subscriber loop or access line during a telephone transmission. Q Link provides single party service to its customers for the duration of each telephone call, and does not provide multi-party (or “party-line”) services.

5. Access to Emergency Services

32. Q Link provides universal access to the 911 system for its customers.

6. Access to 911 and E911 Emergency Service

33. Q Link provides 911 and E911 access for all of its customers. Q Link also complies with the FCC’s regulations governing the deployment and availability of E911 compatible handsets.

7. Access to Operator Services

34. Q Link offers all of its customers access to operator services, in accordance with the FCC’s requirements.

8. Access to Interexchange Service

35. Q Link’s service provides its customers with the ability to make interexchange, or long distance, telephone calls. In fact, interexchange calls are included in the Company’s service with no additional charge.

9. Access to Telecommunications Relay Services

36. Q Link will make available to customers access to telecommunications relay

services (“TRS”) pursuant to 4 CSR 240-3.570(3)(C)(1)(F). Q Link customers requiring access to TRS may do so by dialing 711.

10. Access to Directory Assistance

37. All Q Link customers are able to reach directory assistance services from their wireless handsets.

11. Toll Limitation for Qualified Low-Income Customers

38. Toll limitation allows customers to block the completion of outgoing long distance calls to prevent them from incurring significant long distance charges and risking disconnection. As described above, Q Link provides its wireless service on a prepaid, or pay-as-you-go, basis. Q Link’s service, moreover, is not offered on a distance-sensitive basis and minutes are not charged separately for local or domestic long distance services. Customers also must specifically authorize access for international services, for which additional charges may apply. As the FCC found in its grant of ETC designation to Virgin Mobile, “the prepaid nature of [a prepaid wireless service provider’s] service offering works as an effective toll control.”²¹ The nature of Q Link’s service, therefore, mitigates any concerns that low-income customers will incur significant charges for long distance calls resulting in disconnection of their service.

39. Furthermore, Q Link commits to remit 911 revenues to local authorities. The Company commits to pay in a timely manner all applicable federal, state and local regulatory fees, including but not limited to universal service and E-911 fees.²²

²¹ See *Federal-State Joint Board on Universal Service; In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A); Petitions for Designation as an Eligible Telecommunications Carrier in the States of New York, North Carolina, Pennsylvania, Tennessee and Virginia*, Order, FCC 09-18 (rel. March 5, 2009)(“*Virgin Mobile Order*”), 24 FCC Rcd at 3394 ¶ 34.

²² See ‘TracFone Wireless, Inc. Petition to Rescind State 911/E911 Condition’, FCC Docket No. 96-45 (May 3, 2010).

D. Q Link Will Advertise the Availability of Supported Services

40. Q Link will broadly advertise the availability and rates for the services described above using media of general distribution as required by Section 54.201(d)(2) of the FCC's regulations and pursuant to 4 CSR 240-3.570(2)6-7.²³ The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline and Link-up services, using many media for outreach including internet, radio, television, and newspapers. The Company will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline and Link-Up services, promoting the availability of cost-effective wireless services to this neglected consumer segment. Q Link will also promote the availability of its Lifeline and Link-up offerings by distributing brochures at various state and local social service agencies, and intends to partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline and Link-Up services. Q Link thus commits to publicize Lifeline pursuant to Section 54.405(b) of the FCC Rules and 4 CSR 240-3.570(2)(A)6.

41. In addition, Q Link will utilize its network of retail partners to help promote the availability of its Lifeline and Link-Up plans, especially those retail outlets that are frequented by low income consumers. Q Link will provide retail vendors with signage to be displayed where Company products are sold, and with printed materials describing the Company's Lifeline and Link-Up programs.²⁴ Given the relationship that exists between Q Link, low income consumers, and retail outlets that are often visited by low income consumers, the Company expects to be able to inform consumers of the availability of Lifeline and Link-Up service in a manner that will result in significantly higher participation by qualified consumers than has been the case in the past.

²³ See 47 C.F.R. § 54.201.

²⁴ See attached **Exhibit 5** for sample advertisements.

42. 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, fewer than 20% of consumers eligible for Lifeline Services in the State of Missouri were being provided such services.²⁵ Q Link believes that its advertising and outreach efforts detailed above will result in increased participation in the Lifeline and Link-Up programs.

E. Q Link Requests Designation Throughout Its Service Area in Missouri

43. Q Link is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, Q Link is required to describe the geographic area(s) within which it requests designation as an ETC. Q Link requests designation as an ETC for its entire service area in Missouri.²⁶ Q Link understands that its service area overlaps with rural carriers in Missouri, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline and Link-Up service to qualified low-income households. It does not seek and will not accept high cost support. Therefore, its designation as an ETC will cause no growth in the high cost portions of the USF and will not erode high cost support from any rural telephone company. In fact, the FCC has determined that "[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."²⁷ The Commission may designate Q Link as an ETC in non-rural areas that Q Link serves without redefining the service areas of

²⁵ See attached **Exhibit 6**, 2010 Lifeline Participation Rates by State, which was obtained from USAC, an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the FCC. USAC administers USF programs for high cost companies serving rural areas, low-income consumers, rural health care providers, and schools and libraries. Also attached is an FCC News Release dated September 14, 2009.

²⁶ A list of wire centers in which the Company requests ETC designation is attached hereto as **Exhibit 7**. Since Q Link does not seek designation below the study area level of a rural telephone company, no "cream skimming" analysis is required.

²⁷ See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, 16 FCC Rcd 48, 55 (2000).

non-rural telephone companies. The Commission may designate Q Link as an ETC in rural telephone company service areas upon a finding that such designation would serve the public interest.²⁸

F. Service Commitment Throughout the Proposed Designated Service Area

44. Q Link provides service in Missouri through a combination of its own facilities and by reselling service which it obtains from its underlying facilities-based provider. The provider's network is operational and largely built out. Thus, Q Link will be able to commence offering its Lifeline and Link-Up service to all locations served by its underlying carrier very soon after receiving approval from the Commission. Therefore, Q Link will be able to provide Lifeline and Link-Up service to all qualified customers on a timely basis or within a reasonable period of time in accordance with 47 C.F.R. § 54.202(a)(1). Q Link further commits to provide service throughout its proposed ETC-designated service area to all customers making a reasonable request for service, as required in 47 C.F.R. § 54.202(a)(1)(i).

45. As required by 4 CSR 240-3.570(2)(A)9, Q Link will "provide equal access pursuant to 4 CSR 240-32.100(3) and (4) if all other ETCs in that service area relinquish their designations pursuant to section 214(e) of the Telecommunications Act of 1996."

G. Network Improvement Plan

46. Pursuant to 4 CSR 240-3.570(2)(A)1-3, each request for ETC designation shall include: the intended use of the high-cost support; including a two year plan to demonstrate the proper use of high-cost support. Under FCC guidelines, an ETC applicant must submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed designated service area.

²⁸ See 47 C.F.R. § 54.207(c).

This guideline has no application where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support.

47. Because Q Link seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers, submission of a Five-Year Network Improvement Plan is not required, and the provisions of 4 CSR 240-3.570(2)(A)1-3 are not applicable to Q Link. Based upon the foregoing, Q Link respectfully requests a waiver of 4 CSR 240-3.570(2)(A)1-3. No public utility will be affected by these waivers. The Commission may waive regulations based upon good cause. Good cause exists to waive the stated requirements as Q Link's application is limited to seeking only federal low-cost USF support.

48. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers, is distributed on a per-household basis and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low income users, which is clearly in the public interest.

H. Ability to Remain Functional in Emergency Situations

49. In accordance with 47 CFR §54.202(a)(2) and 4 CSR 240-3.570 (2) 4, Q Link, through its underlying carrier, has the ability to remain functional in emergency situations. Q Link's agreement with Sprint, a Tier I carrier, allows the Company to provide to its customers the same ability to remain functional in emergency situations as currently provided by Sprint to its own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

I. Commitment to Consumer Protection and Service Quality

50. Under FCC and Commission guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards.²⁹ The Company commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

51. Specifically, Q Link commits to comply with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service. A copy of the current version of the CTIA consumer code is attached hereto as **Exhibit 8**.

52. Furthermore, Q Link will satisfy consumer privacy protection standards in compliance with to 4 CSR 240-3.570(2)(A)8.

J. Local Usage Requirement

53. Pursuant to 4 CSR 240-3.570(2)(A)10 and FCC rules, an applicant for ETC designation must demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.³⁰ In analyzing whether an ETC applicant's plan is comparable to the underlying ILEC's, the FCC reviews all aspects of the plan on a case-by-case basis, including the nature of the supported service, the size of the local calling area, the inclusion of additional services (e.g., caller I.D., etc.) and the amount of local usage.³¹

54. Similar to ILEC Lifeline offerings, Q Link customers will have the option to apply the Lifeline discount to the Company's retail rate plans and will have the option for unlimited local calling. Not only will the Company's offering be comparable to the underlying

²⁹ See 47 C.F.R. § 54.202(a)(3); 4 CSR 240-3.570(2)8; 4 CSR 240-3.570(2)(B).

³⁰ 47 C.F.R. § 54.202(a)(4).

³¹ See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, 6385 (2005).

ILEC plans, but it also will exceed them in several respects. Q Link will offer customers a certain amount of service free of charge. In contrast to the ILEC plans, which contain relatively small local calling areas, Q Link customers can use these free minutes to place calls statewide (or even nationwide) because Q Link does not constrict customers' use by imposing a local calling area requirement. Q Link will also provide Lifeline customers with E911 capabilities and access to voice mail, caller I.D., and call waiting services at no cost. The very nature of the wireless phone, i.e. mobility, has a tremendous benefit to many consumers, a benefit to which a monetary value cannot be easily assigned.

K. Equal Access Requirement

55. Pursuant to the FCC's rules and 4 CSR 240-3.570(2)9, Q Link acknowledges it shall provide equal access pursuant to 4 CSR 240-32.100(3) and (4) if all other ETCs in the Designated Service Area relinquish their designations pursuant to section 214(e) of the Telecommunications Act of 1996. The FCC's rules (47 C.F.R § 54.202(a)) do not impose a general equal access requirement on ETC applicants at this time, but instead suggest the applicants acknowledge that an ETC applicant may be required to provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within the service area. Q Link acknowledges this potential and will abide by the requirement should it occur in the future.

L. Q Link Will Comply with Certification and Verification Requirements

56. Section 54.416 of the FCC's Rules requires ETCs to certify a consumer's qualification for Link-Up, and Sections 54.409 and 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Q Link will certify and verify consumer eligibility in accordance with the FCC's requirements and with applicable Commission rules, including 4 CSR 240-31.050.

M. Q Link Will Comply With All Regulations Imposed By The Commission

57. By this Application, Q Link hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Application. Q Link certifies that all federal USF funding received will be used for Lifeline and Link-Up support and will be flowed through to the direct benefit of eligible low income consumers.

58. On behalf of its Missouri customers, Q Link will contribute to the federal and state USF and remits all applicable surcharges and fees in Missouri, including the E911 surcharge. Q Link will likewise pay into the federal and state USF and emergency services fund for its Lifeline customers.

59. Pursuant to 4 CSR 240-3.570(3)(E), Q Link will maintain a record of customer complaints that have been received by the Company, and will maintain a record of complaints filed with the FCC.

60. Q Link will comply with the Commission's requirements set forth in 4 CSR 240-3.570. However, Q Link is a prepaid wireless service provider that does not issue bills to its customers. Therefore, the Company requests waivers of 4 CSR 240-3.570(3)(A) and (B). No public utility will be affected by these waivers. The Commission may waive regulations based upon good cause. Good cause exists to waive the stated requirements as Q Link's application is limited to seeking only federal low-cost USF support. Upon Commission request, Q Link is prepared to answer questions or present additional testimony or other evidence about its services within the state.

IV. DESIGNATION OF Q LINK AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

61. One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.³² There is no question that designation of Q Link as an ETC in Missouri will further the public interest by providing Missouri consumers, especially low-income consumers, with lower prices and higher quality services. Many low-income customers in Missouri have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers.

62. The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. 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 and Link-Up services in the State of Missouri—the intended beneficiaries of universal service.

63. 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

³² *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

available, E911 service in accordance with current FCC requirements. The Company's Lifeline customers will receive the same high-quality wireless services and exceptional customer service provided to all Company customers. Q Link's Lifeline rate plans will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also 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.

64. Q Link's Lifeline and Link-Up programs will provide low-income Missouri residents with the convenience and security offered by wireless services—even if their financial position deteriorates. According to the U.S. Department of Labor Bureau, Missouri's unemployment rate was 8.5% as of October 2011. The economic circumstances indicate that low-income individuals, now more than ever, can greatly benefit from the advantages offered by the Company's Lifeline and Link-Up service, thus allowing those adversely impacted by the failing economy or job loss to have access to a free wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

65. It is also a commonly accepted fact that in today's market all consumers, including qualified Lifeline and Link-Up customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location. Providing Q Link with the authority necessary to offer discounted Lifeline and Link-up services to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

66. Moreover, grant of Q Link’s Application will serve the public interest in increasing the number of ETCs in Missouri. By granting ETC status to Q Link, the Commission will enable Q Link to increase the number of Missouri residents receiving Lifeline and Link-Up support, thereby increasing the amount of USF money flowing into Missouri. In sum, ETC designation in the State of Missouri would enable Q Link to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, Q Link would provide “increased consumer choice, high-quality service offerings, and mobility,”³³ as well as the safety and security of effective 911 and E911 services.³⁴

67. For the above reasons, Q Link has demonstrated that granting it ETC status is in the public interest, in accordance with 47 C.F.R. § 54.202 and 4 CSR 240-3.570(2)(A)5.

A. The Benefits of Competitive Choice

68. The benefits to consumers of being able to choose from among a variety of telecommunications service providers have been acknowledged by the FCC for more than three decades.³⁵ Designation of Q Link as an ETC will promote competition and innovation, and 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. 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.³⁶ Introducing Q Link into the market as an additional wireless ETC provider will afford low income Missouri residents a wider choice of providers and available services while enhancing the competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive

³³ See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

³⁴ See *Id.* at 3391 ¶ 23.

³⁵ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

³⁶ See 47 U.S.C. § 254(b)(1).

marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

B. Impact on the Universal Service Fund

69. Q Link 's request for designation as an ETC solely for purposes of participating in the low-income programs of the USF would not unduly burden the USF or otherwise reduce the amount of funding available to other ETCs. According to the Joint-Board's most recent monitoring report, Lifeline funding totaled approximately \$974 million in 2009 while high-cost program expenditures amounted to approximately \$4.3 billion—more than four times the amount of Lifeline funding.³⁷ With Lifeline and Link-Up, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as Q Link or the Incumbent LEC operating in the same service area. Q Link will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not enrolled in another ETC's Lifeline program. Significantly, the Company's designation as an ETC will not increase the number of persons eligible for Lifeline support. Q Link's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline and Link-Up expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

V. ANTI-DRUG ABUSE CERTIFICATION

70. Q Link certifies that no party to this Application is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

³⁷ See *Universal Service Monitoring Report*, CC Docket 98-202, Tables 2.2 and 3.1 (2010).

VI. CONCLUSION

Based on the foregoing, designation of Q Link as an ETC in the State of Missouri accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, Q Link respectfully requests that the Commission promptly designate Q Link as an ETC in the State of Missouri.

Respectfully submitted,

/s/ Lisa A. Gilbreath
Mark P. Johnson MBN 30740
Lisa A. Gilbreath MBN 62271
SNR Denton US LLP
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Kansas City, Missouri 64111
(816) 460-2400 (Phone)
(816) 531-7545 (Fax)
mark.johnson@snrdenton.com
lisa.gilbreath@snrdenton.com

Attorneys for Q Link Wireless LLC

January 4, 2012

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2012, a true copy of the foregoing Application was served upon the 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

VERIFICATION

State of Florida

County of Broward

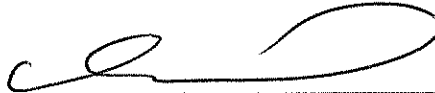
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Certification

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 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.

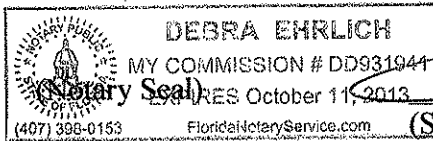
Dated: _____


10/24/11



Issa Asad, Managing Member

Subscribed and sworn to before me this 24 day of October 2011.





(Signature of person authorized to administer oath)

My Commission Expires: _____

October 11, 2013

TABLE OF EXHIBITS

	<u>Exhibit</u>
Certificate of Authority	1
Proposed Lifeline and Link-Up Offering.....	2
Proposed Customer Enrollment Form	3
** HIGHLY CONFIDENTIAL ** Facilities Schematic.....	4
Sample Advertisements	5
2010 Lifeline Participation Rates by State and FCC News Release.....	6
Wire Centers	7
CTIA Code.....	8

EXHIBIT 1

Certificate of Authority



State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
PO Box 778 / 600 W. Main St., Rm. 322
Jefferson City, MO 65102

File Number:
FL1181045
Date Filed: 11/01/2011
Robin Carnahan
Secretary of State

Application for Registration of a Foreign Limited Liability Company

(Submit with filing fee of \$105.00)

1. The name of the foreign limited liability company is Q LINK WIRELESS LLC
2. The name under which the foreign limited liability company will conduct business in Missouri is (must contain "limited company, "limited liability company", "LC", "LLC", "L.C.", or "L.L.C.") (must be filled out if different from line (1)):
3. The foreign limited liability company was formed under the laws of Delaware on the
date of 08/25/2011.
(month/day/year) (state or jurisdiction)
4. The purpose of the foreign limited liability company or the general character of the business it proposes to transact in this state is:
To provide telecommunication services.
5. The name and address of the limited liability company's registered agent in Missouri is (this line must be completed and include a street address):
Incorp Services, Inc. 2847 S. Ingram Mill Rd., Ste. A100, Springfield, MO 65804
Name Address (PO Box may only be used in conjunction with a physical street address) City/State/Zip

The Secretary of State is appointed agent for service of process if the foreign limited liability company fails to maintain a registered agent. **Note:** failure to maintain a registered agent constitutes grounds to cancel the registration of the foreign limited liability company.
6. The address of the registered office in the jurisdiction organized. If none required, then the principal office address of the foreign limited liability company is:
499 Sheridan Street, Suite 300 Dania, FL 33004
Name Address (PO Box may only be used in conjunction with a physical street address) City/State/Zip
7. This application must include a current certificate of good standing/existence from the secretary of state or other similar official in the state of domicile. Such document should be dated within 60 calendar days from filing.

(Please see next page)

Name and address to return filed document:

Name: Kasey Chow

Address: 1725 Windward Concourse, Suite 150

City, State, and Zip Code: Alpharetta, GA 30005

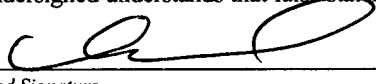
State of Missouri
Creation - LLC/LP 3 Page(s)



T1130502128

In Affirmation thereof, the facts stated above are true and correct.

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040, RSMo)

X  Issa Asad 10/24/11
Authorized Signature *Printed Name* *Date*

Authorized Signature *Printed Name* *Date*

Authorized Signature *Printed Name* *Date*

Delaware

PAGE 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "Q LINK WIRELESS LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTIETH DAY OF OCTOBER, A.D. 2011.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE NOT BEEN ASSESSED TO DATE.


AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "Q LINK WIRELESS LLC" WAS FORMED ON THE TWENTY-FIFTH DAY OF AUGUST, A.D. 2011.



5029810 8300

111120491

You may verify this certificate online
at corp.delaware.gov/authver.shtml


Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 9105373

DATE: 10-20-11

State of Missouri



Robin Carnahan
Secretary of State

CERTIFICATE OF REGISTRATION FOREIGN LIMITED LIABILITY COMPANY

WHEREAS,

Q LINK WIRELESS LLC
FL1181045

Using in Missouri the name

Q LINK WIRELESS LLC

and existing under the laws of the State of Delaware has filed with this state its Application for Registration and whereas this Application for Registration conforms to the Missouri Limited Company Act.

NOW, THEREFORE, I, ROBIN CARNAHAN, Secretary of State of the State of Missouri, by virtue of authority vested in me by law, do hereby certify and declare that on the 1st day of November, 2011, the above Foreign Limited Liability Company is duly authorized to transact business in the State of Missouri and is entitled to any rights granted Limited Liability Companies.

IN TESTIMONY WHEREOF, I hereunto
set my hand and cause to be affixed the
GREAT SEAL of the State of Missouri.
Done at the City of Jefferson, this
1st day of November, 2011.

A handwritten signature in cursive script that reads "Robin Carnahan".

Secretary of State

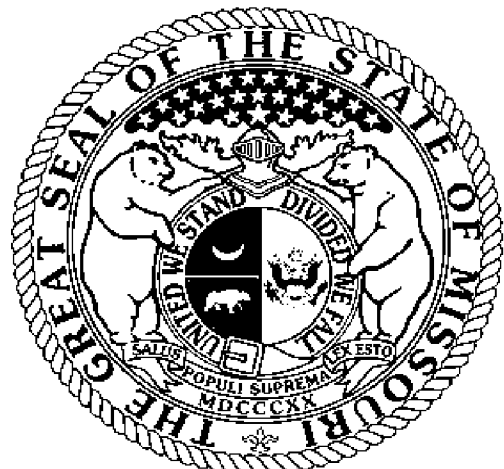


EXHIBIT 2

Proposed Lifeline and Link-Up Offering

Plan 1: 68 Monthly Minutes Plan*

68 anytime minutes per month

(texts are one-third of one minute, i.e. 3 texts = 1 minute)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free Voicemail, Caller-ID, and Call Waiting
- 68 anytime minutes (unused minutes rollover)
- Free Domestic Long Distance
- Free International Long Distance to countries designated at www.qlinkwireless.com (listed below)

Plan 2: 125 Monthly Minutes Plan*

125 anytime minutes per month

(texts are one minute, i.e. 1 text = 1 minute)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free Voicemail, Caller-ID, and Call Waiting
- 125 anytime minutes (unused minutes rollover)
- Free Domestic Long Distance

Plan 3: 250 Monthly Minutes Plan*

250 anytime minutes per month

(texts are one minute, i.e. 1 text = 1 minute)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free Voicemail, Caller-ID, and Call Waiting
- 250 anytime minutes (unused minutes *do not* rollover)
- Free Domestic Long Distance

International Long Distance

Free International Calling Destinations on the 68 Monthly Minutes Plan

(Certain special or off-network locations may be excluded from the Free International Long Distance. Calls to cellular phones are not included unless the word "Cellular" is specifically listed next to the country name. Numbers in parentheses () indicate the Country Code.)

Albania-Tirana (355)	France (33)	Mexico (52)
Andorra (376)	French Antilles (594)	Monaco (377)
Argentina (54)	French Guiana-Cellular (594)	Netherlands (31)
Australia (61)	French Guiana (594)	New Zealand (64)
Austria (43)	Georgia (995)	Norway (47)
Bahamas-Cellular (1)	Germany (49)	Panama (507)
Bahamas (1)	Gibraltar (350)	Paraguay (595)
Bangladesh-Cellular (880)	Greece (30)	Peru (51)
Bangladesh-Chittagong (880)	Guadeloupe (590)	Poland (48)
Bangladesh-Dhaka (880)	Guatemala-Telgua (502)	Portugal (351)
Bangladesh-Sylhet (880)	Hong Kong-Cellular (852)	Romania (40)
Belgium (32)	Hong Kong (852)	Russia-Cellular (7)
Bermuda-Cellular (1)	Hungary (36)	Russia (7)
Bermuda (1)	Iceland (354)	San Marino-Cellular (378)
Bolivia-La Paz (591)	India-Cellular (91)	San Marino (378)
Bolivia-Santa Cruz (591)	India (91)	Saudi Arabia-Riyadh (966)
Brazil (55)	Indonesia-Cellular (62)	Singapore-Cellular (65)
Brunei-Cellular (673)	Indonesia-Jakarta (62)	Singapore (65)
Brunei (673)	Indonesia-Surabaya (62)	Slovakia (421)
Bulgaria (359)	Iraq-Baghdad (964)	Slovenia (386)
Canada-Cellular (1)	Ireland (353)	South Korea-Cellular (82)
Canada (1)	Israel (972)	South Korea (82)
Chile (56)	Italy (39)	Spain (34)
China-Cellular (86)	Japan (81)	Sweden (46)
China (86)	Jordan (962)	Switzerland (41)
Columbia-Cellular (57)	Kazakhstan (7)	Taiwan-Cellular (886)
Columbia (57)	Kenya-Nairobi (254)	Taiwan (866)
Costa Rica (506)	Lithuania (370)	Thailand (66)
Croatia (585)	Luxembourg-Cellular (352)	Turkey (90)
Cyprus-Cellular (357)	Luxembourg (352)	United Kingdom (44)
Cyprus (357)	Macao-Cellular (853)	Uzbekistan (7)
Czech Republic (420)	Macao (853)	Venezuela (58)
Denmark (45)	Malaysia-Cellular (60)	Vietnam-Ho Chi Minh City (84)
Dominican Republic (1)	Malaysia (60)	Zambia (260)
Estonia (372)	Malta (356)	
Finland (358)		

EXHIBIT 3

Proposed Customer Enrollment Form



Missouri Application for Low Income Discounts

You may qualify for a discount on your monthly telephone bill if you or a dependent residing in your household receives low income benefits under certain programs. The discount varies between \$3.50 & \$13.50 depending on your local voice provider and the type of program. The programs that qualify for low income benefits are listed below.

If you or a dependent residing in your household receives benefits from one or more of the programs listed below, please check all that apply, complete the remainder of this form, and return it to Q Link Wireless, llc. with documentation verifying participation in at least one program. Documentation may include a benefit card or a letter to you or a dependent residing in your household from the federal, state, or local agency that administers the qualifying program.

LOW INCOME PROGRAMS

- | | |
|---|---|
| <input type="checkbox"/> MO HealthNet (f/k/a Medicaid) | <input type="checkbox"/> Federal Public Housing Assistance or Section 8 |
| <input type="checkbox"/> Food Stamps | <input type="checkbox"/> National School Free Lunch Program |
| <input type="checkbox"/> Supplemental Security Income | <input type="checkbox"/> Temporary Assistance for Needy Families |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program (LIHEAP) | |

I certify under penalty or perjury that I or a dependent residing in my household currently receives benefits from at least one of the programs listed above. I agree to notify Q Link Wireless, llc. immediately if I or a dependent residing in my household ceases to participate in these programs. I direct and authorize any agency administering these qualifying programs to confirm and provide verifying documents to the Missouri Public Service Commission, or any delegate thereof, of current participation in a program. I confirm local voice service discounts under the low-income programs are limited to one per household and that I am not currently enrolled with any other providers' Lifeline program.

Name of Beneficiary (please print)	Signature of Beneficiary or Guardian/Date
Name listed on Local Voice Service Account (please print)	Signature of Local Voice Subscriber
Address	Telephone Number
City, State, Zip	

I _____ hereby attest that the supporting program documentation was presented and verified.
Company Representative (please print)

Signature	Title	Date
-----------	-------	------

EXHIBIT 5

Sample Advertisements

Free Cell Phone GOVERNMENT PROGRAM

SEE IF YOU QUALIFY

QLink Wireless provides FREE cell phone service and FREE Monthly Minutes through a Government based program to qualifying families and individuals. Pay Nothing! No Contracts, No Credit Checks, No Fees.

Get Started Now!



GET YOUR FREE CELL PHONE NOW!



The FREE Cell Phone & Minutes Program!

250

**Free Minutes
Every Month!**

Pay Nothing

for Local & Long
Distance Calls,
Texting and More!



No Contracts



No Fees



The FREE Cell Phone & Minutes Program!

250

**Free Minutes
Every Month!**

Pay Nothing

for Local & Long
Distance Calls,
Texting and More!



Pay Nothing!

• **No Contracts • No Credit Checks • No Fees**

250

**Free Minutes
Every Month!**

Pay Nothing

for Local & Long
Distance Calls,
Texting and More!

You may qualify if you participate in
programs like Food Stamps and Medicaid.
For additional eligibility programs
see reverse side application.

To get your phone faster visit
the website below



QlinkWireless.com/FreeCellPhone

FREE CELL PHONE GOVERNMENT PROGRAM



GET YOUR FREE CELL PHONE NOW!

QLink Wireless provides FREE cell phone service and FREE Monthly Minutes through a Government based program to qualifying families and individuals. Pay Nothing! No Contracts, No Credit Checks, No Fees.

SEE IF YOU QUALIFY!

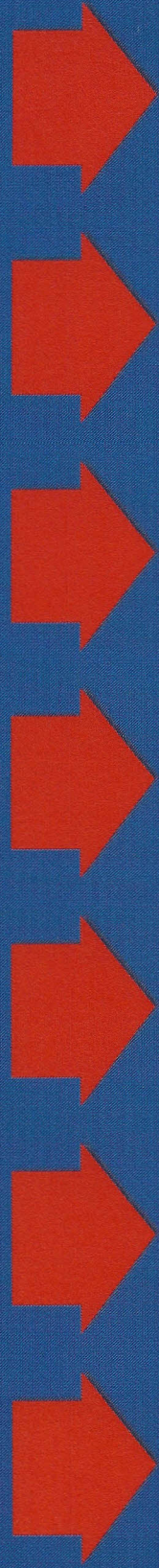


EXHIBIT 6

2010 Lifeline Participation Rates by State and FCC News Release

2010 Lifeline Participation Rates by State

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



Notes:

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.



NEWS

Federal Communications Commission
445 12th Street, S.W.
Washington, D. C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action.
See MCI v. FCC, 515 F 2d 385 (D.C. Circ 1974).

FOR IMMEDIATE RELEASE:
September 14, 2009

NEWS MEDIA CONTACT:
Rosemary Kimball (202) 418-0511
Email: rosemary.kimball@fcc.gov

FCC SUPPORTS “NATIONAL LIFELINE AND LINK UP TELEPHONE DISCOUNT AWARENESS WEEK” - SEPTEMBER 14 – 20, 2009

WASHINGTON, DC -- Today, the Federal Communications Commission (FCC) joined the effort to call attention to the “National Lifeline and Link Up Telephone Discount Awareness Week,” which takes place September 14 – 20, 2009. Various state and local agencies throughout the country will be participating with outreach activities and events. The “Lifeline” and “Link Up” programs provide financial assistance to low-income consumers in connecting a residential phone line and paying their monthly bill. The programs have been active for years and are administered by the FCC and state public utility commissions, but at least half of eligible consumers nationwide do not take advantage of this assistance.

“Lifeline” involves discounts on monthly charges for a primary residential telephone line, including wireless service. “Link Up” involves a discount on the cost of initiating the primary telephone service for a residence, including the activation of a wireless phone that serves as the primary residential telephone. The discounts are available throughout the country, including an enhanced discount on Tribal lands. In general, consumers at or below 135% of the federal poverty guidelines, or who participate in one or more of a number of other assistance programs, are eligible for Lifeline and Link Up.

To help call attention to the availability of these programs, the FCC joins the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Utility Consumer Advocates (NASUCA), and urges government agencies and non-profit organizations to help disseminate information on Lifeline and Link Up to their constituents. More information about the programs and how to apply is available at www.lifeline.gov or <http://www.usac.org/li/low-income/apply-for-support.aspx>.

-- FCC --

EXHIBIT 7

Wire Centers

<u>CLLI</u>	<u>Wire Center</u>	<u>Company</u>
Almamoxa	Alma	Alma Communications Co.
Adrnmoxa	Adrian	AT&T Missouri
Advmora	Advance	AT&T Missouri
Agncmoal	Agency	AT&T Missouri
Frhnmota	Altenburg-Frohna	AT&T Missouri
Antomox50	Antonia	AT&T Missouri
Archmoax	Archie	AT&T Missouri
Argymoa	Argyle	AT&T Missouri
Armsmocr	Armstrong	AT&T Missouri
Asgvmoor	Ash Grove	AT&T Missouri
Buftmohu	Beaufort	AT&T Missouri
Blxymore	Bell City	AT&T Missouri
Kscymo40	Belton	AT&T Missouri
Bntnmoki	Benton	AT&T Missouri
Blngmomy	Billings	AT&T Missouri
Bsmrmope	Bismarck	AT&T Missouri
Blfdmolo	Bloomfield	AT&T Missouri
Bldlmogu	Bloomsdale	AT&T Missouri
Blspmoca	Blue Springs	AT&T Missouri
Byvlarpo	Blytheville	AT&T Missouri
Bntrmofl	Bonne terre	AT&T Missouri
Bnvlmotu	Boonville	AT&T Missouri
Bwlgmoea	Bowling Green	AT&T Missouri
Stlsmo20	Bridgeton	AT&T Missouri
Stlsmo42	Bridgeton	AT&T Missouri
Brrfdmocl	Brookfield	AT&T Missouri
Cmtnmodi	Camdenton	AT&T Missouri
Cmtnmono	Camdenton	AT&T Missouri
Cmpbmoch	Campbell	AT&T Missouri
Knntmobu	Campbell	AT&T Missouri
Cpgrmoed	Cape Girardeau	AT&T Missouri
Cdwlmool	Cardwell	AT&T Missouri
Crjtmomi	Carl Junction	AT&T Missouri
Crthmofl	Carthage	AT&T Missouri
Ctvlmoed	Caruthersville	AT&T Missouri
Cdhlmo51	Cedar Hill	AT&T Missouri
Cntrmoam	Center	AT&T Missouri
Chffmotu	Chaffee	AT&T Missouri
Chtnmomu	Charleston	AT&T Missouri
Chfdmo52	Chesterfield	AT&T Missouri
Chlcmomi	Chillicothe	AT&T Missouri
Clvlmoci	Clarksville	AT&T Missouri
Clvrmlu	Clever	AT&T Missouri
Clspmofi	Climax Springs	AT&T Missouri
Clspmono	Climax Springs	AT&T Missouri
Destmogi	De Soto	AT&T Missouri

Drngmopl	Deering	AT&T Missouri
Deltmosw	Delta	AT&T Missouri
Dxtrmoma	Dexter	AT&T Missouri
Dwngmofr	Downing	AT&T Missouri
Atsnkssf	E Atchison	AT&T Missouri
Ftsckso1	E Fort Scott	AT&T Missouri
Psbgkslo	E pittsburg	AT&T Missouri
Eprmoni	E Prairie	AT&T Missouri
Lvwokssh	East Leavenworth Lansing	AT&T Missouri
Edinmoex	Edina	AT&T Missouri
Eldnmoex	Eldon	AT&T Missouri
Elsbmotw	Elsberry	AT&T Missouri
Essxmoav	Essex	AT&T Missouri
Eurkmo53	Eureka	AT&T Missouri
Exspmome	Excelsior Springs	AT&T Missouri
Frgvmopl	Fair Grove	AT&T Missouri
Kscymo23	Farley	AT&T Missouri
Frtnmopl	Farmington	AT&T Missouri
Fyttmoch	Fayette	AT&T Missouri
Fntnmo54	Fenton	AT&T Missouri
Fstsmoye	Festus-Crystal City	AT&T Missouri
Fiskmowo	Fisk	AT&T Missouri
Ppblmosu	Fisk	AT&T Missouri
Flrvmoge	Flat River	AT&T Missouri
Frfrmost	Frankford	AT&T Missouri
Frtwmost	Fredericktown	AT&T Missouri
Fltnmomi	Fulton	AT&T Missouri
Gidnmohi	Gideon	AT&T Missouri
Kscymo20	Gladstone	AT&T Missouri
Grmlmofr	Gravois Mills	AT&T Missouri
Snbhmofr	Gravois Mills	AT&T Missouri
Grsmmo55	Gray summit	AT&T Missouri
Hnblmoac	Hannibal	AT&T Missouri
Hvtrmo67	Harvester	AT&T Missouri
Haytmofle	Hayti	AT&T Missouri
Pvlymoaa	Herculaneum-Pevely	AT&T Missouri
Higbmogl	Higbee	AT&T Missouri
Hgrgmo56	High Ridge	AT&T Missouri
Hgrgmo57	High Ridge	AT&T Missouri
Hlbomo66	Hillsboro	AT&T Missouri
Hlcmm05sw	Holcomb	AT&T Missouri
Hrnvmope	Hornersville	AT&T Missouri
Imprmo58	Imperial	AT&T Missouri
Kscymo22	Independence	AT&T Missouri
Kscymo44	Independence	AT&T Missouri
Kscymo48	Independence	AT&T Missouri
Jcsnmoci	Jackson	AT&T Missouri

Jsprmoex	Jasper	AT&T Missouri
Jplnmoma	Joplin	AT&T Missouri
Spfdmomo	Joplin	AT&T Missouri
Kscymo01	Kansas City	AT&T Missouri
Kscymo02	Kansas City	AT&T Missouri
Kscymo04	Kansas City	AT&T Missouri
Kscymo05	Kansas City	AT&T Missouri
Kscymo21	Kansas City	AT&T Missouri
Kscymo45	Kansas City	AT&T Missouri
Stlsmo41	Kirkwood	AT&T Missouri
Knnsmolo	Knob noster	AT&T Missouri
Lamtmodi	La Monte	AT&T Missouri
Stlsmo40	Ladue	AT&T Missouri
Stlsmo43	Ladue	AT&T Missouri
Stchmo63	Ladue	AT&T Missouri
Stlsmo01	Ladue	AT&T Missouri
Stlsmo21	Ladue	AT&T Missouri
Stlsmo22	Ladue	AT&T Missouri
Stlsmo26	Ladue	AT&T Missouri
Stlsmo27	Ladue	AT&T Missouri
Lkozmoen	Lake Ozark-Osage Beach	AT&T Missouri
Osbhmofi	Lake Ozark-Osage Beach	AT&T Missouri
Lamrmoov	Lamar	AT&T Missouri
Lncsmogl	Lancaster	AT&T Missouri
Ldwdmolo	Leadwood	AT&T Missouri
Kscymo41	Lees summit	AT&T Missouri
Kscymo42	Liberty	AT&T Missouri
Llbrmoov	Lilbourn	AT&T Missouri
Linnmotw	Linn	AT&T Missouri
Lcwdmoce	Lockwood	AT&T Missouri
Losnmosk	Louisiana	AT&T Missouri
Mldnmocr	Malden	AT&T Missouri
Mnchmo59	Manchester	AT&T Missouri
Mrhlmohe	Marble hill	AT&T Missouri
Mrclmoch	Marceline	AT&T Missouri
Mrnvmoho	Marionville	AT&T Missouri
Kscymo55	Marshall	AT&T Missouri
Mrshmoga	Marshall	AT&T Missouri
Mrtmmoni	Marston	AT&T Missouri
Mxvlmo60	Maxville	AT&T Missouri
Metamoba	Meta	AT&T Missouri
Mexcmoju	Mexico	AT&T Missouri
Mbrlmoam	Moberly	AT&T Missouri
Mnttmobe	Monett	AT&T Missouri
Mtcymolo	Montgomery City	AT&T Missouri
Mrhsmono	Morehouse	AT&T Missouri
Neshmogle	Neosho	AT&T Missouri

Nevdmono	Nevada	AT&T Missouri
Nwfrmovi	New franklin	AT&T Missouri
Nwmdmosh	New Madrid	AT&T Missouri
Nixamoaa	Nixa	AT&T Missouri
Okrgmoam	Oak Ridge	AT&T Missouri
Olapmost	Old appleton	AT&T Missouri
Oranmoco	Oran	AT&T Missouri
Stlsm023	Overland	AT&T Missouri
Pcfcmo61	Pacific	AT&T Missouri
Patnmoto	Patton	AT&T Missouri
Pyvlmoti	Paynesville	AT&T Missouri
Prvlmoli	Perryville	AT&T Missouri
Skstmogr	Perryville	AT&T Missouri
Pchnmote	Pocahontas	AT&T Missouri
Pondmo62	Pond	AT&T Missouri
Pgvlmodr	Portageville	AT&T Missouri
Prsxmo68	Portage Des Sioux	AT&T Missouri
Qulnmofa	Qulin	AT&T Missouri
Kscymo24	Raytown	AT&T Missouri
Rpblmope	Republic	AT&T Missouri
Rcmdmopr	Richmond	AT&T Missouri
Rcwdmoor	Richwoods	AT&T Missouri
Riscoex	Risco	AT&T Missouri
Stlsmo24	Riverview	AT&T Missouri
Rrvlmopl	Rogersville	AT&T Missouri
Ruvlmora	Rushville	AT&T Missouri
Snanmomo	San antonio	AT&T Missouri
Stlsmo25	Sappington	AT&T Missouri
Scsymoco	Scott City	AT&T Missouri
Sdlimota	Sedalia	AT&T Missouri
Sentmore	Senath	AT&T Missouri
Sltrmola	Slater	AT&T Missouri
Smvlmotr	Smithville	AT&T Missouri
Kscymo25	So kansas city	AT&T Missouri
Stlsm045	Spanish Lake	AT&T Missouri
Spfdmote	Springfld	AT&T Missouri
Spfdmotu	Springfld	AT&T Missouri
Stclmoma	St Clair	AT&T Missouri
Stjsmodj	St Joseph	AT&T Missouri
Stjsmomd	St Joseph	AT&T Missouri
Stlsmo02	St Louis	AT&T Missouri
Stlsmo03	St Louis	AT&T Missouri
Stlsmo04	St Louis	AT&T Missouri
Stlsmo05	St Louis	AT&T Missouri
Stlsmo06	St Louis	AT&T Missouri
stlsmo07	St Louis	AT&T Missouri
Stlsmo08	St Louis	AT&T Missouri

Stlsmo11	St Louis	AT&T Missouri
Stmymoli	St Marys	AT&T Missouri
Stjsmodn	St. Joseph	AT&T Missouri
Stnbmosu	Stanberry	AT&T Missouri
Stfrmore	Strafford	AT&T Missouri
Trenmoel	Trenton	AT&T Missouri
Tscmmoem	Tuscumbia	AT&T Missouri
Unimolu	Union	AT&T Missouri
Vypkmo64	Valley park	AT&T Missouri
Vrslmodr	Versailles	AT&T Missouri
Vinnmoga	Vienna	AT&T Missouri
Wlgvmowy	Walnut Grove	AT&T Missouri
Wardmoma	Wardell	AT&T Missouri
Waremowh	Ware	AT&T Missouri
Washmobe	Washington	AT&T Missouri
Wbcymoor	Webb City	AT&T Missouri
Wdspmo01	Harvester	AT&T Missouri
Wlvlmomu	Wellsville	AT&T Missouri
Wphlmogle	Westphalia	AT&T Missouri
Wlrldmosh	Willard	AT&T Missouri
Wyttmoor	Wyatt	AT&T Missouri
Parmmoxa	Parma	BPS Telephone
Stelmoxa	Steele	BPS Telephone
Bernmoxa	Bernie	BPS Telephone
Clevmoxa	Cleveland	Cass County Telephone
Cgtnmoxa	Creighton	Cass County Telephone
Drxlmoxa	Drexel	Cass County Telephone
Elynmoxa	East Lynne	Cass County Telephone
Grcymoxa	Gardencity	Cass County Telephone
Pclrmoxa	Peculiar	Cass County Telephone
Amnmoxa	Amazonia	CenturyTel (Spectra)
Aurrmoxa	Aurora	CenturyTel (Spectra)
Avcymoxa	Avenue city	CenturyTel (Spectra)
Avllmoxa	Avilla	CenturyTel (Spectra)
Blgrmoxa	Belgrade	CenturyTel (Spectra)
Bctrmoxa	Birch Tree	CenturyTel (Spectra)
Blckmoxa	Bolckow	CenturyTel (Spectra)
Brymmoxa	Braymer	CenturyTel (Spectra)
Bnghmoxa	Bronaugh	CenturyTel (Spectra)
Cldnmoxa	Caledonia	CenturyTel (Spectra)
Cmrnmoxa	Cameron	CenturyTel (Spectra)
Cntnmoxa	Canton	CenturyTel (Spectra)
Clncmoxa	Clarence	CenturyTel (Spectra)
Csdlmoxa	Clarksdale	CenturyTel (Spectra)
Clnsmoxa	Collins	CenturyTel (Spectra)
Cncrmoxa	Concordia	CenturyTel (Spectra)
Csbymoxa	Cosby	CenturyTel (Spectra)

Estnmoxa	Easton	CenturyTel (Spectra)
Egspmoxa	Edgar Springs	CenturyTel (Spectra)
Elsnmoxa	Ellsinore	CenturyTel (Spectra)
Emermoxa	Elmer	CenturyTel (Spectra)
Evtnmoxa	Everton	CenturyTel (Spectra)
Ewngmoxa	Ewing	CenturyTel (Spectra)
Flmrmoxa	Fillmore	CenturyTel (Spectra)
Frmtmoxa	Fremont	CenturyTel (Spectra)
Gdcymoxa	Golden city	CenturyTel (Spectra)
Gowrmoxa	Gower	CenturyTel (Spectra)
Gvspmoxa	Grove spring	CenturyTel (Spectra)
Hmtnmoxa	Hamilton	CenturyTel (Spectra)
Htvlmoxa	Hartville	CenturyTel (Spectra)
Hlnamoxa	Helena	CenturyTel (Spectra)
Hstnmoxa	Houston	CenturyTel (Spectra)
Hmvlmoxa	Humansville	CenturyTel (Spectra)
Hnwlmoxa	Hunnewell	CenturyTel (Spectra)
Irdlmoxa	Irondale	CenturyTel (Spectra)
Jrspmoxa	Jerico Springs	CenturyTel (Spectra)
Kahkmoxa	Kahoka	CenturyTel (Spectra)
Kddrmoxa	Kidder	CenturyTel (Spectra)
Kgtnmoxa	Kingston	CenturyTel (Spectra)
Lgrnmoxa	La Grange	CenturyTel (Spectra)
Lpltmoxa	La Plata	CenturyTel (Spectra)
Lddnmoxa	Laddonia	CenturyTel (Spectra)
Lwcymoxa	Lowry City	CenturyTel (Spectra)
Macnmoxa	Macon	CenturyTel (Spectra)
Mnesmozxa	Manes	CenturyTel (Spectra)
Myvlmoxa	Maysville	CenturyTel (Spectra)
Milomoxa	Milo	CenturyTel (Spectra)
Mncymoxa	Monroe City	CenturyTel (Spectra)
Mntimoxa	Monticello	CenturyTel (Spectra)
Mtgvmoxa	Mountain grove	CenturyTel (Spectra)
Mtvrmoxa	Mt Vernon	CenturyTel (Spectra)
Nebomoxa	Nebo	CenturyTel (Spectra)
Nrwdmoxa	Norwood	CenturyTel (Spectra)
Osbrmoxa	Osborn	CenturyTel (Spectra)
Osclmoxa	Osceola	CenturyTel (Spectra)
Plmymoxa	Palmyra	CenturyTel (Spectra)
Parmsmoxa	Paris	CenturyTel (Spectra)
Prrymoxa	Perry	CenturyTel (Spectra)
Plbgmoxa	Plattsburg	CenturyTel (Spectra)
Potsmoxa	Potosi	CenturyTel (Spectra)
Revrmoxa	Revere	CenturyTel (Spectra)
Robymoxa	Roby	CenturyTel (Spectra)
Rkvlmoxa	Rockville	CenturyTel (Spectra)
Rodlmoxa	Rosendale	CenturyTel (Spectra)

Snfemoxa	Santa Fe	CenturyTel (Spectra)
Srcxmoxa	Sarcoxie	CenturyTel (Spectra)
Svnmoxa	Savannah	CenturyTel (Spectra)
Shcymoxa	Schell city	CenturyTel (Spectra)
Slbnmoxa	Shelbina	CenturyTel (Spectra)
Shlnmoxa	Sheldon	CenturyTel (Spectra)
Swvlmoxa	Stewartsville	CenturyTel (Spectra)
Stvlmoxa	Stoutsville	CenturyTel (Spectra)
Tmbrmoxa	Timber	CenturyTel (Spectra)
Trmbmoxa	Trimble	CenturyTel (Spectra)
Trnymoxa	Turney	CenturyTel (Spectra)
Vnznmoza	Vanzant	CenturyTel (Spectra)
Wlkrmoxa	Walker	CenturyTel (Spectra)
Wyldmoxa	Wayland	CenturyTel (Spectra)
Weblmoxa	Weaubleau	CenturyTel (Spectra)
Wqncmoxa	West quincy	CenturyTel (Spectra)
Whvlmoxa	Whitesville	CenturyTel (Spectra)
Winomoxa	Winona	CenturyTel (Spectra)
Asldmoxa	Ashland	CenturyTel Missouri
Agstmoxa	Augusta	CenturyTel Missouri
Avamoxa	Ava	CenturyTel Missouri
Blndmoxa	Bland	CenturyTel Missouri
Bleymoxa	Blue Eye	CenturyTel Missouri
Brbnmoxa	Bourbon	CenturyTel Missouri
Bdylmoxa	Bradleyville	CenturyTel Missouri
Baswmoxa	Branson W	CenturyTel Missouri
Bflomoxa	Buffalo	CenturyTel Missouri
Cablomoxa	Cabool	CenturyTel Missouri
Cpfrmoxa	Cape Fair	CenturyTel Missouri
Csvlmoxa	Cassville	CenturyTel Missouri
Clfdmoxa	Caulfield	CenturyTel Missouri
Cenlmoxa	Centralia	CenturyTel Missouri
Chmsmoxa	Chamois	CenturyTel Missouri
Clrkmoxa	Clark	CenturyTel Missouri
Clmamoxa	Columbia	CenturyTel Missouri
Clmamoxb	Columbia	CenturyTel Missouri
Cnwymoxa	Conway	CenturyTel Missouri
Basnmoxa	Crane	CenturyTel Missouri
Canmoxa	Crane	CenturyTel Missouri
Crtmmoxa	Cross timbers	CenturyTel Missouri
Cubamoxa	Cuba	CenturyTel Missouri
Drdnmoxa	Dardenne	CenturyTel Missouri
Dfncmoxa	Defiance	CenturyTel Missouri
Ekldmoxa	Elkland	CenturyTel Missouri
Extrmoxa	Exeter	CenturyTel Missouri
Folymoxa	Foley	CenturyTel Missouri
Frldmoxa	Fordland	CenturyTel Missouri

Frstmoxa	Foristell	CenturyTel Missouri
Frsymoxa	Forsyth	CenturyTel Missouri
Galnmoxa	Galena	CenturyTel Missouri
HLVlmoxa	Hallsville	CenturyTel Missouri
Hwpnmoxb	Hawk Point	CenturyTel Missouri
Hrmtmoxa	Hermitage	CenturyTel Missouri
Hghlmoxa	High Hill	CenturyTel Missouri
Hldvmoxa	Highlandville	CenturyTel Missouri
Holsmoxa	Holstein	CenturyTel Missouri
Hrlymoxa	Hurley	CenturyTel Missouri
Jmtwmoxa	Jamestown	CenturyTel Missouri
Jnknmoxa	Jenkins	CenturyTel Missouri
Jnbgmoxa	Jonesburg	CenturyTel Missouri
Kmcymoxa	Kimberling City	CenturyTel Missouri
Kshkmoxa	Koshkonong	CenturyTel Missouri
Lebgmoxa	Leasburg	CenturyTel Missouri
Lsbgmoxa	Louisburg	CenturyTel Missouri
Mnfdmoxa	Mansfield	CenturyTel Missouri
Mrfdmoxa	Marshfield	CenturyTel Missouri
Mtvlmoxa	Marthasville	CenturyTel Missouri
Mrsnmoxa	Morrison	CenturyTel Missouri
Msmllmoxa	Moscow	CenturyTel Missouri
Mtvwmoxa	Mountain View	CenturyTel Missouri
Nwmlmoxa	New Melle	CenturyTel Missouri
Ningmoxa	Niangua	CenturyTel Missouri
Oflnmoxa	O fallon	CenturyTel Missouri
Olmrmoxa	Old Monroe	CenturyTel Missouri
Ozrknox	Ozark	CenturyTel Missouri
Psbgmoxa	Pittsburg	CenturyTel Missouri
Prrrhmx	Prairie home	CenturyTel Missouri
Pstnmoxa	Preston	CenturyTel Missouri
Rdspmoxa	Reeds Spring	CenturyTel Missouri
Rhptmoxb	Rocheport	CenturyTel Missouri
Rcbhmoxa	Rockaway beach	CenturyTel Missouri
Safemoxa	Safe	CenturyTel Missouri
Symprmoxa	Seymour	CenturyTel Missouri
Shknmoxa	Shell Knob	CenturyTel Missouri
Sprtmoxa	Sparta	CenturyTel Missouri
Stprmoxa	St Peters	CenturyTel Missouri
Stjmmoxa	St. James	CenturyTel Missouri
Stfnmoxa	Sturgeon	CenturyTel Missouri
Smvixa	Summersville	CenturyTel Missouri
Thvlmoxa	Thomasville	CenturyTel Missouri
Troymoxa	Troy	CenturyTel Missouri
Txtnmoxa	Truxton	CenturyTel Missouri
Urbnmoxa	Urbana	CenturyTel Missouri
Vchymoxa	Vichy	CenturyTel Missouri

Wrtnmoxa	Warrenton	CenturyTel Missouri
Wplnmoxa	West plains	CenturyTel Missouri
Wtldmoxa	Wheatland	CenturyTel Missouri
Wlsmoxa	Willow Springs	CenturyTel Missouri
Wnfdmoxa	Winfield	CenturyTel Missouri
Wlrgmoxa	Wooldridge	CenturyTel Missouri
Wrcymoxa	Wright city	CenturyTel Missouri
Pergarxa	Pea Ridge (Jacket)	CenturyTel NW Arkansas
Sgmnmoxa	Seligman	CenturyTel NW Arkansas
Atlnmoxa	Atlanta	Chariton Valley Telephone
Bevrmoxa	Bevier	Chariton Valley Telephone
Bcklmoxa	Bucklin	Chariton Valley Telephone
Blvmoxa	Bynumville	Chariton Valley Telephone
Callmoxa	Callao	Chariton Valley Telephone
Clhlmoxa	Clifton Hill	Chariton Valley Telephone
Ethlmoxa	Ethel	Chariton Valley Telephone
Exclmoxa	Excello	Chariton Valley Telephone
Frgrmoxa	Forest Green	Chariton Valley Telephone
Halemoxa	Hale	Chariton Valley Telephone
Hnvimoxa	Huntsville	Chariton Valley Telephone
Jcvlmoxa	Jacksonville	Chariton Valley Telephone
Mbtnmoxa	New Boston	Chariton Valley Telephone
Nwcmoxa	New cambria	Chariton Valley Telephone
Prhlmoxa	Prairie Hill	Chariton Valley Telephone
Slbrmoxa	Salisbury	Chariton Valley Telephone
Hltwmoxa	Halltown	Choctaw Telephone
Hgvlmoxa	Higginsville	Citizens Telephone
Amstmoxa	Amsterdam	Craw-Kan Telephone
Asbrmoxa	Asbury	Craw-Kan Telephone
Armaksxa	E Mulberry	Craw-Kan Telephone
Pltnksxa	E pleasanton	Craw-Kan Telephone
Fstrmoxa	Foster	Craw-Kan Telephone
Humemoxa	Hume	Craw-Kan Telephone
Prclmoxa	Purcell	Craw-Kan Telephone
Eltnmoxa	Redford	Ellington Telephone
Apcymoxa	Appleton City	Embarq Missouri
Blbnmoxa	Blackburn	Embarq Missouri
Bltwmoxa	Blairstown	Embarq Missouri
Brztmoxa	Brazito	Embarq Missouri
Bcknmoxa	Buckner	Embarq Missouri
Btlrmoxa	Butler	Embarq Missouri
Clhnmoxa	Calhoun	Embarq Missouri
Clfrmoxa	California	Embarq Missouri
Cmpnmoxa	Camden Point	Embarq Missouri
Cntwmoxa	Centertown	Embarq Missouri
Cnvwmoxa	Centerview	Embarq Missouri
Chlhmxoa	Chilhowee	Embarq Missouri

Clbgmoxa	Clarksburg	Embarq Missouri
Cltnmoxa	Clinton	Embarq Missouri
Coalmoxa	Coal	Embarq Missouri
Clcmmoxx	Cole Camp	Embarq Missouri
Cragmoxa	Craig	Embarq Missouri
Debrmoxa	Dearborn	Embarq Missouri
Dpwrmoxa	Deepwater	Embarq Missouri
Egtnmoxa	Edgerton	Embarq Missouri
Eugnmxox	Eugene	Embarq Missouri
Frfxmoxa	Fairfax	Embarq Missouri
Flvwmxox	Ferrelview	Embarq Missouri
Ftlwmoxa	Fort Leonard Wood	Embarq Missouri
Gnrgmoxa	Green ridge	Embarq Missouri
Hrdnmoxa	Hardin	Embarq Missouri
Hnvlmoxa	Harrisonville	Embarq Missouri
Hnrtmoxa	Henrietta	Embarq Missouri
Hldnmoxa	Holden	Embarq Missouri
Holtmoxa	Holt	Embarq Missouri
Hpknmoxa	Hopkins	Embarq Missouri
Hostmoxa	Houstonia	Embarq Missouri
Ionimoxa	Ionia	Embarq Missouri
Jfcymoxa	Jefferson City	Embarq Missouri
Hlsmmoxa	Jefferson City	Embarq Missouri
Krnymoxa	Kearney	Embarq Missouri
Kgcymoxa	King City	Embarq Missouri
Kgvlmoxa	Kingsville	Embarq Missouri
Lbnnmoxa	Lebanon	Embarq Missouri
Letnmoxa	Leeton	Embarq Missouri
Lxtnmoxa	Lexington	Embarq Missouri
Lnclmoxa	Lincoln	Embarq Missouri
Lkltmoxa	Lake Lotawana	Embarq Missouri
Lnjcmoxa	Lone jack	Embarq Missouri
MIbnmoxa	Malta Bend	Embarq Missouri
Mscymoxa	Missouri city	Embarq Missouri
Mtrsmoxa	Montrose	Embarq Missouri
Mdcymoxa	Mound City	Embarq Missouri
Rcptmoxa	Mound City	Embarq Missouri
Nbfdmoxa	New bloomfield	Embarq Missouri
Nwbgmoxa	Newburg	Embarq Missouri
Nrbrmoxa	Norborne	Embarq Missouri
Okgvmoxa	Oak Grove	Embarq Missouri
Odssmoxa	Odessa	Embarq Missouri
Orxkmoxa	Orrick	Embarq Missouri
Oevlamoxa	Otterville	Embarq Missouri
Pcngmoxa	Pickering	Embarq Missouri
Plcymoxa	Platte city	Embarq Missouri
Plhlmoxa	Pleasant hill	Embarq Missouri

Rcldmoxa	Richland	Embarq Missouri
Rollmoxa	Rolla	Embarq Missouri
Rlvmoxa	Russellville	Embarq Missouri
Wnvlmoxa	Salem	Embarq Missouri
Shtnmoxa	Smithton	Embarq Missouri
Strbmoxa	St Robert	Embarq Missouri
Stimmoxa	St Thomas	Embarq Missouri
Stbgmoxx	Strasburg	Embarq Missouri
Swspmoxa	Sweet Springs	Embarq Missouri
Syrcmoxa	Syracuse	Embarq Missouri
Taosmoxa	Taos	Embarq Missouri
Tarkmoxa	Tarikio	Embarq Missouri
Tptnmoxa	Tipton	Embarq Missouri
Urchmoxa	Urich	Embarq Missouri
Wrswmoxa	Warsaw	Embarq Missouri
Wyvlmoxa	Waynesville	Embarq Missouri
Wgtm oxa	Wellington	Embarq Missouri
Wstnmoxa	Weston	Embarq Missouri
Wndsmoxa	Windsor	Embarq Missouri
Frbrmoxa	Farber	Farber Telephone
Gerlmoxa	Gerald	Fidelity Telephone
Nwhnmoxa	Lyon	Fidelity Telephone
Owvlmoxa	Owensville	Fidelity Telephone
Slvmoxa	Owensville	Fidelity Telephone
Gdmnmoxa	Goodman	Goodman Telephone
Lngnmoxa	Lanagan	Goodman Telephone
Grnbmoxa	Granby	Granby Telephone
Lardmoxa	Laredo	Grand River Mutual
Lnnsmoxa	Linneus	Grand River Mutual
Mdvlmoxa	Meadville	Grand River Mutual
Mtmrmoxa	Mt Moriah	Grand River Mutual
Nhtnmoxa	New Hampton	Grand River Mutual
Prnlmoxa	Parnell	Grand River Mutual
Prdnmoxa	Purdin	Grand River Mutual
Rvwdmoxa	Ravenwood	Grand River Mutual
Rdwymoxa	Ridgeway	Grand River Mutual
Shrdmoxa	Sheridan	Grand River Mutual
Wsctmoxa	Washington Center	Grand River Mutual
Lamniaxo	Andover	Grand River Mutual
Brnrmoxa	Barnard	Grand River Mutual
Bthnmoxa	Bethany	Grand River Mutual
Brngmoxa	Browning	Grand River Mutual
Cavlmoxa	Cainsville	Grand River Mutual
Chulmoxa	Chula	Grand River Mutual
Cnjtmoxa	Conception Junction	Grand River Mutual
Drtnmoxa	Darlington	Grand River Mutual
Dnvrmoxa	Denver	Grand River Mutual

Eavlmoxa	Eagleville	Grand River Mutual
Gntrmoxa	Gentry	Grand River Mutual
Glcymoxa	Gilman city	Grand River Mutual
Grhmmoxa	Graham	Grand River Mutual
Jmptmoxa	Jamesport	Grand River Mutual
Dvcyiaxo	South Davis City	Grand River Mutual
Ldlwmoxa	Ludlow	Green Hills Telephone
Mrvimoxa	Mooreville	Green Hills Telephone
Lcspmoxa	Lock Springs	Green Hills Telephone
Polomoxa	Polo	Green Hills Telephone
Wlngmoxa	Wheeling	Green Hills Telephone
Avlnmoxa	Avalon	Green Hills Telephone
Brrgmoxa	Breckenridge	Green Hills Telephone
Cwglmoxa	Cowgill	Green Hills Telephone
Dawnmoxa	Dawn	Green Hills Telephone
Knvlmoxa	Knoxville	Green Hills Telephone
Mtldmoxa	Maitland	Holway Telephone
Brjtmoxa	Burlington Junction	Iamo Telephone Co.
Clmtmoxa	Clearmont	Iamo Telephone Co.
Elmomoxa	Elmo	Iamo Telephone Co.
Wsbomoxa	Westboro	Iamo Telephone Co.
Frtniaxo	Athens	Iowa Telecom
Brvliaxo	South Braddyville	Iowa Telecom
Axvsmoxa	Big spring	Kingdom Telephone
Rhhlmoxa	Metz	KLM Telephone Co
Lthpmoxa	Lathrop	Lathrop Telephone
Powlmoxa	Powell	Le-Ru Telephone
Phlamoxa	Philadelphia	Mark Twain Rural Telephone
Wltwmoxa	Williamstown	Mark Twain Rural Telephone
Brshmoxa	Brashear	Mark Twain Rural Telephone
Drhmmoxa	Durham	Mark Twain Rural Telephone
Gntpmoxa	Greentop	Mark Twain Rural Telephone
Hrldmoxa	Hurdland	Mark Twain Rural Telephone
Janemoxa	Jane	McDonald County Telephone
Pivlmoxa	Pineville	McDonald County Telephone
Arsnmoxa	Anderson	McDonald County Telephone
Arrkmoxa	Arrow Rock	Mid-Missouri Telephone
Ftunmoxa	Fortuna	Mid-Missouri Telephone
Gllmmoxa	Gilliam	Mid-Missouri Telephone
Hgpnmoxa	High Point	Mid-Missouri Telephone
Lthmmoxa	Latham	Mid-Missouri Telephone
Mrjtmoxa	Marshall junction	Mid-Missouri Telephone
Nlsnmoxa	Nelson	Mid-Missouri Telephone
Plgvmoxa	Pilot grove	Mid-Missouri Telephone
Spedmoxa	Speed	Mid-Missouri Telephone
Bctnmoxa	Bunceton	Mid-Missouri Telephone
Blwrmoxa	Blackwater	Mid-Missouri Telephone Co.

Millmoxa	Miller	Miller Telephone Co
Frmnmoxa	Freeman	MoKan Dial
Gncymoxa	Lemons	NE MO Rural
Mmphmoxa	Memphis	NE MO Rural
Nwflmoxa	New florence	New Florence
Nwlnmoxa	New London	New London Telephone
Orchmoxa	Orchardfrm	Orchard Farm Telephone
Orgnmoxa	Oregon	Oregon Farmers Mutual Telephone
Neolmoxa	Noel	Ozark Telephone
Swcymoxa	Southwest city	Ozark Telephone
Pcvymoxx	Peace Valley	Peace Valley Telephone
Rcptmoxb	So Hamburg	Rock Port Telephone
Wtsnmoxa	Watson	Rock Port Telephone
Sencmoxa	Seneca	Seneca Telephone
Tiffmoxa	Tiff City	Seneca Telephone
Wrbgmoxa	Coal	Socket Telecom
Mavlmoxa	Hopkins	Socket Telecom
Chvlmoxa	Cherryville	Steelville Telephone Exchange
Hzzhmoxa	Huzzah	Steelville Telephone Exchange
Sevlmoxa	Steelville	Steelville Telephone Exchange
Elrgmoxa	Eldridge	Stoutland Telephone
Stldmoxa	Stoutland	Stoutland Telephone
Albymoxa	Albany	Windstream Missouri
Aldrmoxa	Aldrich	Windstream Missouri
Aldlmoxa	Allendale	Windstream Missouri
Blflmoxa	Bellflower	Windstream Missouri
Blvrnmxo	Bolivar	Windstream Missouri
Clubmoxx	Clubb	Windstream Missouri
Cffymoxa	Coffey	Windstream Missouri
Crcrmoxa	Crocker	Windstream Missouri
Dixnmoxa	Dixon	Windstream Missouri
Eolimixa	Eolia	Windstream Missouri
Frplmoxa	Fair Play	Windstream Missouri
Frdlmoxa	Fairdealng	Windstream Missouri
Frvwmoxa	Fairview	Windstream Missouri
Flrnmoxa	Florence	Windstream Missouri
Gallmoxa	Gallatin	Windstream Missouri
Gdinmoxa	Grandin	Windstream Missouri
Gtcymoxa	Grant City	Windstream Missouri
Hlwymoxa	Halfway	Windstream Missouri
Hldymoxa	Holliday	Windstream Missouri
Ibermoxx	Iberia	Windstream Missouri
Jmsnmoxa	Jameson	Windstream Missouri
Lcldmoxa	Laclede	Windstream Missouri
Lbrlmoxa	Liberal	Windstream Missouri
Mdsnmoxa	Madison	Windstream Missouri
Mrbgmoxa	Martinsburg	Windstream Missouri

Mndnmoxx	Mendon	Windstream Missouri
Mdtwmoxa	Middletown	Windstream Missouri
Kklvmomo	Milan	Windstream Missouri
Mdnmmoxa	Mindenmines	Windstream Missouri
Mrvlmoxa	Morrisvl	Windstream Missouri
Nylrmoxx	Naylor	Windstream Missouri
Nlvlmoxa	Neelyville	Windstream Missouri
Nhfrmoxa	New Hartford	Windstream Missouri
Olnymoxa	Olney	Windstream Missouri
Ptbgmoxx	Pattonsburg	Windstream Missouri
Pdmtmoxx	Piedmont	Windstream Missouri
Plhpmoxa	Pleasant hope	Windstream Missouri
Polkmoxa	Polk	Windstream Missouri
Prdymoxa	Purdy	Windstream Missouri
Rtvlmoxx	Rothville	Windstream Missouri
Silxmoxa	Silex	Windstream Missouri
Stezmoxa	St elizabeth	Windstream Missouri
Stcymoxa	Stark City	Windstream Missouri
Sktnmoxa	Stockton	Windstream Missouri
Socymoxa	Stotts city	Windstream Missouri
Stvrnox	Stover	Windstream Missouri
Smnrnox	Sumner	Windstream Missouri
Unstmoxa	Union Star	Windstream Missouri
Vandmoxa	Vandalia	Windstream Missouri
Vrnamoxa	Verona	Windstream Missouri
Wpplmoxx	Wappapelo Park	Windstream Missouri
Whtnmoxa	Wheaton	Windstream Missouri
Wsvlmoxa	Williamsville	Windstream Missouri
Wntnmoxa	Winston	Windstream Missouri

EXHIBIT 8

CTIA Code

CTIA

Consumer Code *for* Wireless Service

To provide consumers with information to help them make informed choices when selecting wireless service, the CTIA and the wireless carriers that are signatories below have developed the following Consumer Code. The carriers that are signatories to this Code have voluntarily adopted the principles, disclosures, and practices here for wireless service provided to individual consumers, including voice, messaging, and data services sold either on a postpaid or prepaid basis.

THE WIRELESS CARRIERS THAT ARE SIGNATORIES TO THIS CODE WILL:

ONE

DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS

For each service plan offered to new consumers, wireless carriers will disclose to consumers at point of sale and on their web sites, at least the following information, as applicable: (a) the coverage area for the service; (b) any activation or initiation fee; (c) the monthly access fee or base charge; (d) the amount and nature of any voice, messaging, or data allowances included in the plan (such as night and weekend minutes); (e) the charges for domestic usage in excess of any included allowances or outside of the coverage area; (f) for prepaid service plans, the period of time during which any balance is available for use; (g) whether there are prohibitions on data service usage and whether there are network management practices that will have a material impact on the customer's wireless data experience; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) the amount or nature of any late payment fee; (k) whether a fixed-term contract is required and its duration; (l) the amount and nature of any early termination fee that may apply; and (m) the trial

period during which a consumer may cancel service without any early termination fee, as long as the consumer complies with any applicable return policy.

TWO

MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE

Wireless carriers will make available at point of sale and on their web sites maps depicting approximate domestic coverage applicable to each of their service plans currently offered to consumers. To enable consumers to make comparisons among carriers, these maps will be generated using generally accepted methodologies and standards to depict the carrier's outdoor coverage. All such maps will contain or link to an appropriate legend concerning limitations and/or variations in wireless coverage and map usage, including any geographic limitations on the availability of any services included in the plan. Wireless carriers will periodically update such maps as necessary to keep them reasonably current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, carriers will request and incorporate coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

THREE

PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE

When a customer initiates new service or a change in existing service, the carrier will provide or confirm any new material terms and conditions of the ongoing service with the customer.

FOUR

ALLOW A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates postpaid service with a wireless carrier, the customer will be informed of and given a period of not less than 14 days to try out the service. The carrier will not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including usage charges, may still apply.

FIVE

PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service plans or devices, wireless carriers will disclose material charges and conditions related to the advertised prices and services, including if applicable and to the extent the advertising medium reasonably allows: (a) whether activation or initiation fees apply; (b) monthly access fees or base charges; (c) the amount and nature of any voice, messaging, or data service allowances included in the plan; (d) the charges for any domestic usage in excess of any included allowances or outside of the coverage area; (e) for prepaid service plans, the period of time during which any balance is available for use; (f) whether there are network management practices that will have a material impact on the customer's wireless data experience; (g) whether any additional taxes, fees or surcharges apply; (h) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (i) whether a fixed-term contract is required and its duration; (j) early termination fees; (k) the terms and conditions related to receiving a product or service for "free;" (l) for any service plan advertised as "nationwide," (or using similar terms), the carrier will have available substantiation for this claim; and (i) whether prices or benefits apply only for a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

SIX

SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS

On customers' bills, carriers will distinguish (a) monthly charges for service and features, and other charges collected and retained by the carrier, from (b) taxes, fees and other charges collected by the carrier and remitted to federal state or local governments. Carriers will not label cost recovery fees or charges as taxes.

SEVEN

PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS

Carriers will not modify the material terms of their postpaid customers' contracts in a manner that is materially adverse to those customers without providing a reasonable

advance notice of a proposed modification and allowing those customers a time period of not less than 14 days to cancel their contracts with no early termination fee.

EIGHT

PROVIDE READY ACCESS TO CUSTOMER SERVICE

Customers will be provided a toll-free telephone number to access a carrier's customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Each wireless carrier will provide information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information will be included, at a minimum, on all billing statements, in written responses to customer inquiries and on carriers' web sites. Each carrier will also make such contact information available, upon request, to any customer calling the carrier's customer service departments.

NINE

PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES

Wireless carriers will respond in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

TEN

ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Each wireless carrier will abide by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and will make available to the public its privacy policy concerning information collected online. Each wireless carrier will abide by the CTIA Best Practices and Guidelines for Location-Based Services.

ELEVEN

PROVIDE CONSUMERS WITH FREE NOTIFICATIONS FOR VOICE, DATA AND MESSAGING USAGE, AND INTERNATIONAL ROAMING

Each wireless provider will provide, at no charge: (a) a notification to consumers of currently-offered and future domestic wireless plans that include limited data allowances when consumers approach and exceed their allowance for data usage and will incur overage charges; (b) a notification to consumers of currently-offered and future domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach and exceed their allowance for those services and will incur overage charges; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. Wireless providers will generate the notifications described above to postpaid consumers based on information available at the time the notification is sent. Wireless consumers will not have to affirmatively sign up in order for these notifications to be sent. Each wireless provider shall provide its customers at least two of these alerts by October 17, 2012 and all of these alerts by April 17, 2013. Wireless providers will clearly and conspicuously disclose tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.