

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

In the Matter of the Cancellation of the     )  
Eligible Telecommunications Carrier     )     **File No. RD-2025-XXXX**

**MOTION TO REVOKE ELIGIBLE  
TELECOMMUNICATIONS CARRIER STATUS**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and moves for the Missouri Public Service Commission (Commission) to revoke the Eligible Telecommunications Carrier (ETC) status of Q-Link Wireless, LLC, (Q-Link) and states:

1. On September 26, 2012, the Commission granted ETC designation to Q-Link in Case No. RA-2012-0205. Q-Link's ETC status is limited to receiving federal funding for the Lifeline program. Q-Link began receiving funding in December 2012.

2. As explained in Staff's *Memorandum*, attached hereto as Appendix A, Staff has recently become aware that Q-Link has violated several Commission Rules:

1). Q-Link failed to file its required 2024 Annual Lifeline Eligible Telecommunications Carrier Certification form (Form 555), which was due by January 31, 2025. Commission Rule 20 CSR 4240-31.014(2) acknowledges the Lifeline program is subject to the federal requirements identified in the FCC rules. This annual filing is a requirement of FCC rule 47 CFR 54.416(b) and must be filed with the Federal Communications Commission (FCC), the federal Universal Service Fund (USF) Administrator, and the state commission(s).

2). All attempts to reach Q-Link contacts maintained with the Commission have failed, and Staff is unable to locate additional contact information. Commission Rule 20 CSR 4240-31.015(1)(B) requires eligible ETCs to maintain a

current list of company-designated contacts within the Commission's Electronic Filing Information System (EFIS). And

3). On October 15, 2024, Q-Link and its CEO pleaded guilty to defrauding the Lifeline program by misleading the FCC about how many subscribers were actually using the service and receiving Lifeline funds it was not entitled to receive.<sup>1</sup> Q-Link's CEO is facing prison time and, jointly with Q-Link, has agreed to pay restitution to the FCC exceeding \$100 Million.<sup>2</sup> Consequently, the FCC's Enforcement Bureau has suspended Q-Link from participating in any universal support programs and initiated a proceeding to debar the Company from future participation in all federal universal support mechanisms.<sup>3</sup> Q-Link stopped receiving Lifeline funding in Missouri in October 2024, however, it did not notify Staff of its violation of the universal service fund program requirements, in violation of Commission Rule 20 CSR 4240-31.015(1)(C).<sup>4</sup>

3. Due to Q-Link's failure to comply with the applicable rules, Staff moves for the Commission to revoke the Q-Link's ETC status pursuant to its failure to meet the ETC requirements of 20 CSR 4240-31.015.

**WHEREFORE,** Staff respectfully recommends the Commission revoke the Eligible Telecommunications Carrier status of Q-Link Wireless, LLC; and grant such other and further relief as is just in the circumstances.

---

<sup>1</sup> United States Attorney's Office, Southern District of Florida, Press Release, *Nationwide Telecommunications Provider and its CEO Plead Guilty to Massively Defrauding Federal Government Programs Meant to Aid the Needy*, October 15, 2024, <https://www.justice.gov/usao-sdfl/pr/nationwide-telecommunications-provider-and-its-ceo-plead-guilty-massively-defrauding>.

<sup>2</sup> *Id.*

<sup>3</sup> Letter from FCC to Issa Asad, CEO of Q Link Wireless LLC; Notice of Suspension and Debarment Proceeding; DA 24-1130; released November. 8, 2024.

<sup>4</sup> 20 CSR 4240-31.015(1)(C) requires ETCs to provide a copy, to the manager of the Commission's Telecommunications Department, of any finding by a state or federal authority that the company has violated universal service fund program requirements.

Respectfully submitted,

/s/ Mark Johnson

**MARK JOHNSON**

Missouri Bar No. 64940

Chief Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-7431 (Voice)

573-751-9285 (Fax)

[mark.johnson@psc.mo.gov](mailto:mark.johnson@psc.mo.gov)

Attorney for the Staff of the

Missouri Public Service Commission

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 28<sup>th</sup> day of March, 2025, to all counsel of record.

/s/ Mark Johnson

## MEMORANDUM

To: Official Case File

From: Kari Salsman, Senior Research/Data Analyst  
John Van Eschen, Regulatory Compliance Manager  
Telecommunications Department

Date: March 28, 2025

Subject: Q-Link Wireless, LLC

The Staff of the Missouri Public Service Commission (Staff) recommends the Commission revoke the Eligible Telecommunications Carrier (ETC) status of Q-Link Wireless, LLC (Q-Link). The Commission granted ETC designation to Q-Link in Case No. RA-2012-0205, on September 26, 2012, for the purpose of receiving federal universal support for Lifeline service. The company began receiving funding in December 2012.

Q-Link has violated Commission Rules and Lifeline program rules. The company failed to file its required 2024 Annual Lifeline Eligible Telecommunications Carrier Certification form (Form 555), which was due by January 31, 2025.<sup>1</sup> All attempts to reach the Q-Link's contacts maintained with the Commission have failed, and Staff is unable to locate additional contact information. Additionally, on October 15, 2024, Q-Link pleaded guilty to defrauding the Lifeline program by misleading the FCC about how many subscribers were actually using the service and receiving Lifeline funds it was not entitled to receive.<sup>2</sup> Q Link's CEO is facing prison time and Q-Link and its CEO have jointly agreed to pay restitution to the FCC exceeding \$100 Million.<sup>3</sup> Consequently, the FCC's Enforcement Bureau has suspended Q-Link from participating in any universal support programs and initiated a proceeding to debar the Company from future participation in all federal universal support mechanisms.<sup>4</sup> Q-Link stopped receiving Lifeline funding in Missouri in October 2024, however the Company did not notify Staff of its violation of the universal service fund program requirements.

---

<sup>1</sup> Missouri rule 20 CSR 4240-31.014(2) acknowledges the Lifeline program is subject to federal requirements in FCC rules. FCC rule 47 CFR 54.416(b) requires ETCs participating in the Lifeline program to submit a filing with the FCC, federal USF administrator and state commission documenting their Lifeline annual re-certification efforts.

<sup>2</sup> United States Attorney's Office, Southern District of Florida, Press Release, *Nationwide Telecommunications Provider and its CEO Plead Guilty to Massively Defrauding Federal Government Programs Meant to Aid the Needy*, October 15, 2024, <https://www.justice.gov/usao-sdfl/pr/nationwide-telecommunications-provider-and-its-ceo-plead-guilty-massively-defrauding>

<sup>3</sup> *Id.*

<sup>4</sup> Letter from FCC to Issa Asad, CEO of Q Link Wireless LLC; Notice of Suspension and Debarment Proceeding; DA 24-1130; released November. 8, 2024.

Due to the Company's failure to comply with the applicable rules, Staff recommends the Commission revoke Q-Link's ETC status pursuant to its failure to meet ETC requirements of 20 CSR 4240-31.015.