

Lance J.M. Steinhart, P.C.
Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

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IDAHO PUBLIC
UTILITIES COMMISSION

Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

August 21, 2020

VIA EMAIL DELIVERY

Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, Idaho 83702

QLW-T-20-01

Re: Q LINK WIRELESS LLC
Application to Expand ETC Service Area

Dear Ms. Hanian:

Attached please find for filing Q LINK WIRELESS LLC's Application to Expand its Eligible Telecommunications Carrier Service Area in the State of Idaho.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me at 770-232-7805 or hkirby@telecomcounsel.com. Thank you.

Respectfully submitted,

s/ Heather Kirby

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.

Attorneys for Q LINK WIRELESS LLC

Attachments

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

)	
In the Matter of the Application of)	
Q LINK WIRELESS LLC to Expand its)	
Eligible Telecommunications Carrier)	Case No. _____
Service Area)	
)	

**APPLICATION OF Q LINK WIRELESS TO EXPAND ITS
ELIGIBLE TELECOMMUNICATIONS CARRIER SERVICE AREA**

I. INTRODUCTION

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 Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the Idaho Public Utilities Commission’s (“Commission”) rules and regulations, hereby files this application to expand Q LINK’s Eligible Telecommunications Carrier (“ETC”) service area in the State of Idaho (“Application”). Q LINK was designated as a Lifeline-only ETC by the Commission by Order No. 32995 dated March 13, 2014 in Case No. QLW-T-13-01 (“ETC Designation Order”). Q LINK requests to expand its ETC service area solely to provide Lifeline service to additional qualifying Idaho households through participation in the federal Universal Service Fund’s (“USF”) low-income program and the Idaho Telephone Service Assistance Program (“ITSAP”). The Company does not seek access to USF support for the purpose of providing service to high-cost areas.³

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ Given that Q LINK only 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 Q LINK.

As demonstrated herein, and as certified by Exhibit 1 attached hereto, Q LINK continues to meet all statutory and regulatory requirements for designation as an ETC, including the requirements outlined in the FCC's *Lifeline Modernization Order*.⁴ Rapid grant of Q LINK's request would advance the public interest by enabling the Company to expand the availability of Lifeline service to many more low-income consumers in Idaho, especially in light of the current national state of emergency. Accordingly, Q LINK respectfully requests that the Commission expeditiously approve this Application.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for *Q LINK WIRELESS, LLC*
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

II. DESIGNATED SERVICE AREA

In the ETC Designation Order, the Commission designated Q LINK as an ETC within the wire centers listed in Exhibit 6 of the Company's application for designation as an ETC filed in Case No. QLW-T-13-01 ("ETC Application"). Q LINK provides wireless Lifeline service to eligible Idaho Lifeline customers utilizing the Sprint Spectrum L.P. ("Sprint") and/or T-Mobile USA, Inc. ("T-Mobile") wireless networks. Through its agreement with these underlying carriers, Q LINK customers benefit from Sprint and T-Mobile's ability to remain functional in emergency

⁴ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 00-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*Third Report and Order*" or "*Lifeline Modernization Order*").

situations, 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.

Q LINK seeks to revise its ETC designated service area as described in attached Exhibit 2 to include additional areas where Sprint and T-Mobile have wireless coverage.⁵ Pursuant to 199 IAC 39.2(3)d, Q LINK adopts the exchange area maps on file with the Commission for the exchange areas listed in Exhibit 2.

III. Q LINK MEETS APPLICABLE REQUIREMENTS

FCC rules, 47 C.F.R. §§ 54.201-54.202 (the “FCC ETC Rules”), set forth the information that must be contained in an application for designation as an ETC. In its ETC Application, incorporated herein by reference, Q LINK provided all of the information required by FCC ETC Rules in effect at the time, including those set forth in the FCC’s *Lifeline Reform Order*.⁶ The Commission found in its ETC Designation Order that Q LINK met the requirements for designation as an ETC. Q LINK has complied with the conditions of its ETC designation and will continue to do so. In accordance with 47 C.F.R. § 54.202(a)(1)(i) and by the attached certification, Q LINK certifies that it will comply with the service requirements applicable to the support that it receives. Q LINK hereby also provides additional and updated information as a result of the FCC’s *Lifeline Modernization Order*, which was issued after the Company’s ETC Designation Order.

⁵ For convenience, Exhibit 2 contains the wire centers originally approved and the new proposed wire centers which are labeled accordingly.

⁶ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”).

A. Provision of Supported Services

Q LINK is able to provide all services 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 its requested service area in the State of Idaho, including broadband Internet access service, a supported service as of December 2, 2016. Q LINK commits that its Lifeline-supported services will continue to meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward. The Company's current Lifeline offering is attached hereto as Exhibit 3.⁷ Q LINK currently offers these Lifeline wireless plans throughout its existing service area in Idaho.

B. Eligibility Verification

Q LINK determines eligibility of Lifeline subscribers in accordance with 47 C.F.R. § 54.410, utilizing the streamlined eligibility criteria implemented by the *Lifeline Modernization Order* (see 47 C.F.R. § 54.409). The FCC has taken steps to curb abuse in the Lifeline program by establishing the National Lifeline Eligibility Verifier ("National Verifier") which transfers the responsibility of eligibility determination away from Lifeline providers.⁸ Q LINK will rely on the National Verifier to determine initial and ongoing eligibility of Idaho Lifeline subscribers. The National Verifier queries the National Lifeline Accountability Database ("NLAD") for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from Q LINK or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. As such, Q LINK complies with the requirements of 47 C.F.R. §54.404.

⁷ The Company's terms and conditions can be found at www.qlinkwireless.com.

⁸ See *Lifeline Modernization Order*, section III.C.

C. Non-Usage Policy

Q LINK has updated its non-usage policy in compliance with changes in federal regulations. Q LINK will not seek reimbursement from the USF for inactive subscribers and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), Q LINK will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage.

IV. EXPANSION OF Q LINK'S ETC SERVICE AREA WOULD PROMOTE THE PUBLIC INTEREST

In its ETC Designation Order, the Commission found that designation of Q LINK as an ETC would serve the public interest. Expansion of Q LINK's ETC service area will increase the number of low-income individuals that can benefit from the advantages offered by the Company's Lifeline service, ensuring they have access to wholly-supported or discounted wireless voice and broadband service, and will thus further the public interest by providing more low-income Idaho consumers with low-priced and high-quality services. Q LINK's prepaid wireless plans enable consumers to enjoy the benefits of wireless telecommunication and mobile broadband access without being subject to extensive credit reviews and long-term service commitments, which historically have prevented many low-income Americans, including many Idaho residents, from reaping the full benefits of the intensely competitive wireless market.

Q LINK offers a unique, easy to use, competitive, and highly affordable wireless telecommunications service, which benefits qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional service. Q LINK's Lifeline offerings compare favorably with those of other competitive ETCs, and provide Lifeline customers with voice minutes, unlimited text messages, and a data allotment (with current plan options meeting the voice *and* broadband minimum service standards), at no net cost to the customer after application of Lifeline and ITSAP support. In today's market, consumers, including qualified Lifeline 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 greater ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers regardless of location. Mobile service often also serves as a key bridge in closing the homework gap for students who live in rural areas with limited access to broadband.

Q LINK employs a state-of-the-art proprietary fraud prevention system and does not utilize agents or third-party representatives for Lifeline enrollment, and does not pay any commissions or sales incentives on Lifeline sign-ups. This model, which Q LINK has employed for almost the entirety of its Lifeline operations, was recently endorsed by the FCC which adopted an order to prevent Lifeline ETCs from paying commissions to agents.⁹ This direct-to-customer model utilizes technology to protect against waste, fraud and abuse. Q LINK recognized the value of this approach early and has a detailed, proven methodology that has and will continue to give it a competitive advantage over its competitors, demonstrating Q LINK's commitment to being a

⁹ See *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, 00-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, FCC 19-111, (rel. Nov. 14, 2019) ("*Fifth Report and Order*"), ¶68.

trusted steward with public resources. Q LINK's business model is unique in that the Company is able to reach unserved and underserved Lifeline-eligible consumers, including in less dense areas that have not been a focus of other Lifeline providers; in fact, on average, eighty percent (80%) of Q LINK's customers are *new* and have not previously participated in the Lifeline program.

With the comprehensive strength and experience of Q LINK's management team, the Company's proven technology-based business model, and Q LINK's solid history as a Lifeline provider, Q LINK is uniquely-positioned to meet the needs of Lifeline customers, utilizing the Company's innovative outreach and high integrity enrollment process, and Q LINK remains committed to careful stewardship of the Lifeline program. Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing Q LINK with the authority necessary to offer discounted Lifeline services to eligible residents in additional areas of Idaho undoubtedly promotes the public interest.

V. CONCLUSION

Q LINK submits that the information contained herein, together with the information in the Company's ETC Application, incorporated herein by reference, demonstrates that Q LINK continues to meet the requirements for ETC designation and that expansion of Q LINK's ETC service area would promote the public interest.

WHEREFORE, Q LINK respectfully requests that the Commission promptly grant this Application and expand Q LINK's Lifeline-only ETC service area as requested herein.

Respectfully submitted,

s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys at Law
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

Attorneys for Q LINK WIRELESS, LLC

August 21, 2020


EXHIBIT 1

CERTIFICATION

CERTIFICATION

I, Issa Asad, hereby depose and state that I am the Chief Executive Officer (“CEO”) of Q LINK WIRELESS LLC (“Q LINK”); that I have read the Application of Q LINK to expand its Eligible Telecommunications Carrier Service Area and know the contents thereof; and that the contents are true and correct to the best of my knowledge and belief. I further certify that Q LINK will comply with the service requirements applicable to the low-income universal service support that it receives.

Q LINK WIRELESS LLC

By: 

Issa Asad, CEO

EXHIBIT 2

Proposed Service Area

STATE	CLLI	ILEC NAME	RATE CENTER	NEW (N)
ID	ALBNIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	ALBION	
ID	ALMOIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	ALMO	N
ID	ARCOIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	ARCO	
ID	ELBAIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	ELBA	N
ID	HLBKIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	HOLBROOK	N
ID	HOWEIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	ARCO	
ID	MALTIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	MALTA	
ID	MCKYIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	MACKAY	N
ID	MLCYIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	MALAD	
ID	MOORIDXC	ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	ARCO	N
ID	CMBRIDXC	CAMBRIDGE TELEPHONE COMPANY	CAMBRIDGE	N
ID	CMBRIDXC	CAMBRIDGE TELEPHONE COMPANY	COUNCIL	N
ID	CMBRIDXC	CAMBRIDGE TELEPHONE COMPANY	INDIAN VLY	N
ID	LWMNIDXC	CAMBRIDGE TELEPHONE COMPANY	LOWMAN	N
ID	BRUNIDXC	CENTURYTEL GEM STATE INC-ID DBA CENTURYLINK - ID	BRUNEAU	
ID	GRVWIDXC	CENTURYTEL GEM STATE INC-ID DBA CENTURYLINK - ID	GRAND VIEW	N
ID	RCFDIDXC	CENTURYTEL GEM STATE INC-ID DBA CENTURYLINK - ID	RICHFIELD	
ID	LEDRIDXC	CENTURYTEL OF IDAHO, INC. DBA CENTURYLINK	LEADORE	N
ID	NFRKIDXC	CENTURYTEL OF IDAHO, INC. DBA CENTURYLINK	SALMON	N
ID	SLMNIDXC	CENTURYTEL OF IDAHO, INC. DBA CENTURYLINK	SALMON	N
ID	ABRIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	ABERDEEN	
ID	CARYIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	CAREY	N
ID	CSCDIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	CASCADE	
ID	DNLYIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	DONNELLY	
ID	EKCYIDXA	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	ELK CITY	N
ID	FRFDIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	FAIRFIELD	N
ID	GRVYIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	GARDEN VLY	N
ID	HMDLIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	HOMEDALE	
ID	HRBNIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	HORSEHBEND	
ID	MCCLIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	MCCALL	
ID	MRNGIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	MARSING	
ID	NWMDIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	NEWMEADOWS	
ID	PARMIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	PARMA	
ID	RGNSIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	RIGGINS	N
ID	SPFDIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	SPRINGFLD	
ID	SWETIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	SWEET	
ID	WHBRIDXX	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	WHITE BIRD	N
ID	WLDRIDXC	CITIZENS TELECOM IDAHO-FRONTIER COMM OF IDAHO	WILDER	
ID	DRGSIDMA	COLUMBINE TELCO DBA SILVER STAR COMMUNICATIPMS	DRIGGS	
ID	CHLSIDXC	CUSTER TELEPHONE COOPERATIVE, INC.	CHALLIS	N
ID	CYTNIDXC	CUSTER TELEPHONE COOPERATIVE, INC.	CLAYTON	N
ID	EKBNIDXC	CUSTER TELEPHONE COOPERATIVE, INC.	ELK BEND	N
ID	MAY IDXC	CUSTER TELEPHONE COOPERATIVE, INC.	MAY	N
ID	ARBNDXC	DIRECT COMMUNICATIONS ROCKLAND, INC.	ARBON	N
ID	PARSIDXC	DIRECT COMMUNICATIONS ROCKLAND, INC.	PARIS	
ID	RKLDIDXC	DIRECT COMMUNICATIONS ROCKLAND, INC.	ROCKLAND	

STATE	CLLI	ILEC NAME	RATE CENTER	NEW (N)
ID	FRLDIDXX	FARMERS MUTUAL TELEPHONE CO.	FRUITLAND	
ID	FILRIDAA	FILER MUTUAL TELEPHONE CO.	FILER	
ID	HLSTIDXC	FILER MUTUAL TELEPHONE CO.	HOLLISTER	
ID	STATIDMA	FREMONT TELCOM CO	ASHTON	
ID	STATIDMA	FREMONT TELCOM CO	ISLANDPARK	
ID	STATIDMA	FREMONT TELCOM CO	ST ANTHONY	
ID	FRTNWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC.	EVERGREEN	
ID	GRFDWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC.	CORA	
ID	RCFRWAXB	FRONTIER COMMUNICATIONS NORTHWEST INC.	SETTERS	
ID	FRFDWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC.	ROCK CREEK	
ID	NWPTWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC.	ALBENI	
ID	BNFYIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	BONERSFRRY	N
ID	BOVLIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	BOVILL	N
ID	BYVWIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	BAYVIEW	
ID	CLFKIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	CLARK FORK	
ID	CRALIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	COERDALENE	
ID	DERYIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	DEARY	N
ID	GENSIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	GENESEE	
ID	HOPEIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	HOPE	
ID	HRSNIDXA	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	HARRISON	
ID	HYLKIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	HAYDENLAKE	
ID	KLLGIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	KELLOGG	N
ID	MLLNIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	MULLAN	N
ID	MSCWIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	MOSCOW	
ID	ORFNIDXC	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	OROFINO	N
ID	PECKIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	PECK	
ID	PIRCIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	PIERCE	N
ID	PLMRIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	PLUMERWRLY	
ID	PNHRIDXA	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	KELLOGG	
ID	PRLKIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	PRIESTLAKE	N
ID	PRRVIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	PRIEST RIV	
ID	PSFLIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	BLUEBELL	
ID	PSFLIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	POST FALLS	
ID	PTLTIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	POTLATCH	N
ID	RTHDIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	RATHDRUM	
ID	SNPNIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	SANDPOINT	
ID	SPLKIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	SPIRITLAKE	
ID	STMRIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	ST MARIES	N
ID	WEPPIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	WEIPPE	N
ID	WLLCIDXX	FRONTIER COMMUNICATIONS NORTHWEST, INC. - ID	WALLACE	N
ID	LENRIDXA	INLAND TELEPHONE CO.	LENORE	
ID	UNTWWAXA	INLAND TELEPHONE CO.	LEON	
ID	MDVAIDXC	MIDVALE TELEPHONE EXCHANGE, INC.	MIDVALE	
ID	STNLIDXC	MIDVALE TELEPHONE EXCHANGE, INC.	STANLEY	
ID	WRLKIDXC	MIDVALE TELEPHONE EXCHANGE, INC.	WARM LAKE	N
ID	WRRNIDAA	MIDVALE TELEPHONE EXCHANGE, INC.	WARREN	N

STATE	CLLI	ILEC NAME	RATE CENTER	NEW (N)
ID	YLPNIDXC	MIDVALE TELEPHONE EXCHANGE, INC.	YELLOWPINE	N
ID	DUBSIDXC	MUD LAKE TELEPHONE COOPERATIVE ASSOICATION, INC.	DUBOIS	N
ID	HAMRIDXC	MUD LAKE TELEPHONE COOPERATIVE ASSOICATION, INC.	HAMER	
ID	KLGRIDXC	MUD LAKE TELEPHONE COOPERATIVE ASSOICATION, INC.	KILGORE	N
ID	MNVWIDXC	MUD LAKE TELEPHONE COOPERATIVE ASSOICATION, INC.	MONTEVIEW	N
ID	TRTNIDXC	MUD LAKE TELEPHONE COOPERATIVE ASSOICATION, INC.	TERRETON	
ID	SOMTIDXC	OREGON - IDAHO UTILITIES, INC.	SOUTH MTN	
ID	JLTTIDXA	POTLATCH TELEPHONE CO., INC.	JULIAETTA	N
ID	KNDRIDXX	POTLATCH TELEPHONE CO., INC.	KENDRICK	N
ID	TROYIDXX	POTLATCH TELEPHONE CO., INC.	TROY	
ID	NRLDIDXC	PROJECT MUTUAL TELEPHONE COOP.	NORLAND	
ID	MNDKIDXC	PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.	MINIDOKA	
ID	OKLYIDXC	PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.	OAKLEY	
ID	PAULIDXC	PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.	PAUL	
ID	RPRTIDXC	PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.	RUPERT	
ID	AMFLIDMA	QWEST CORPORATION	POCATELLO	
ID	BLFTIDMA	QWEST CORPORATION	BLACKFOOT	
ID	BLSSIDMA	QWEST CORPORATION	TWIN FALLS	
ID	BNCRIDMA	QWEST CORPORATION	POCATELLO	N
ID	BOISIDMA	QWEST CORPORATION	BOISE	
ID	BOISIDNW	QWEST CORPORATION	BOISE	
ID	BOISIDSW	QWEST CORPORATION	BOISE	
ID	BOISIDWE	QWEST CORPORATION	BOISE	
ID	BRLYIDMA	QWEST CORPORATION	BURLEY	
ID	BUHLIDMA	QWEST CORPORATION	TWIN FALLS	
ID	CLWLIDMA	QWEST CORPORATION	CALDWELL	
ID	CRGMID01	QWEST CORPORATION	CRAIGMONT	
ID	CSFRIDMA	QWEST CORPORATION	TWIN FALLS	
ID	CTWDID01	QWEST CORPORATION	COTTONWOOD	N
ID	DECLIDMA	QWEST CORPORATION	BURLEY	
ID	DWNYIDMA	QWEST CORPORATION	POCATELLO	
ID	DYTNIDMA	QWEST CORPORATION	POCATELLO	
ID	EAGLIDNM	QWEST CORPORATION	BOISE	
ID	EDHZIDMA	QWEST CORPORATION	TWIN FALLS	
ID	EMMTIDMA	QWEST CORPORATION	EMMETT	
ID	FKLNIDMA	QWEST CORPORATION	POCATELLO	
ID	FRTHIDMA	QWEST CORPORATION	IDAHO FALLS	
ID	GAVLID01	QWEST CORPORATION	GRANGEVL	N
ID	GDNGIDMA	QWEST CORPORATION	TWIN FALLS	
ID	GLFYIDMA	QWEST CORPORATION	MT HOME	
ID	GRACIDMA	QWEST CORPORATION	POCATELLO	N
ID	HALYIDMA	QWEST CORPORATION	KETCHUM	
ID	HGMNIDMA	QWEST CORPORATION	TWIN FALLS	
ID	IDCYIDMA	QWEST CORPORATION	BOISE	N
ID	IDFLIDMA	QWEST CORPORATION	IDAHO FALLS	
ID	INKMIDMA	QWEST CORPORATION	POCATELLO	

STATE	CLLI	ILEC NAME	RATE CENTER	NEW (N)
ID	JERMIDNM	QWEST CORPORATION	TWIN FALLS	
ID	KAMHID01	QWEST CORPORATION	KAMIAH	N
ID	KMBRIDMA	QWEST CORPORATION	TWIN FALLS	
ID	KOSKID01	QWEST CORPORATION	KOOSKIA	N
ID	KTCHIDMA	QWEST CORPORATION	KETCHUM	
ID	KUN AidMA	QWEST CORPORATION	BOISE	
ID	LAPWID01	QWEST CORPORATION	LAPWAI	
ID	LHSPIDMA	QWEST CORPORATION	POCATELLO	
ID	LSMNIDMA	QWEST CORPORATION	RIGBY	
ID	LSTNIDSH	QWEST CORPORATION	LEWISTON	
ID	MCCMIDMA	QWEST CORPORATION	POCATELLO	
ID	MDTNIDMA	QWEST CORPORATION	BOISE	
ID	MELBIDMA	QWEST CORPORATION	MELBA	
ID	MRDNIDMA	QWEST CORPORATION	BOISE	
ID	MRTGIDMA	QWEST CORPORATION	MURTAUGH	
ID	MTHOIDMA	QWEST CORPORATION	MT HOME	
ID	MTHOIDSO	QWEST CORPORATION	MT HOME	
ID	MTPLIDMA	QWEST CORPORATION	POCATELLO	
ID	NMPAIDMA	QWEST CORPORATION	NAMPA	
ID	NPMOIDMA	QWEST CORPORATION	NEW PLYMTH	
ID	NZPRID01	QWEST CORPORATION	NEZPERCE	N
ID	PCTLIDMA	QWEST CORPORATION	POCATELLO	
ID	PCTLIDNO	QWEST CORPORATION	POCATELLO	
ID	PSTNIDMA	QWEST CORPORATION	POCATELLO	
ID	PYTTIDMA	QWEST CORPORATION	PAYETTE	
ID	RBRTIDMA	QWEST CORPORATION	RIGBY	
ID	RGBYIDMA	QWEST CORPORATION	RIGBY	
ID	RIRIIDMA	QWEST CORPORATION	IDAHO FALLS	
ID	RVSDIDMA	QWEST CORPORATION	BLACKFOOT	
ID	RXBGIDMA	QWEST CORPORATION	IDAHO FALLS	
ID	SDSPIDMA	QWEST CORPORATION	POCATELLO	N
ID	SHLYIDMA	QWEST CORPORATION	IDAHO FALLS	
ID	SHSHIDMA	QWEST CORPORATION	TWIN FALLS	
ID	STARIDNM	QWEST CORPORATION	BOISE	
ID	THTCIDMA	QWEST CORPORATION	POCATELLO	N
ID	TWFLIDMA	QWEST CORPORATION	TWIN FALLS	
ID	WESRIDMA	QWEST CORPORATION	WEISER	
ID	WNDLIDMA	QWEST CORPORATION	TWIN FALLS	
ID	GLFYIDCO	RURAL TELEPHONE CO.	ATLANTA	
ID	GLFYIDCO	RURAL TELEPHONE CO.	PRAIRIE	
ID	GLFYIDCO	RURAL TELEPHONE CO.	TIPANUK	
ID	SHOPIDXC	RURAL TELEPHONE CO.	SHOUP	N
ID	FRDMWYXC	SILVER STAR TELEPHONE CO., INC.	ALPINE	N
ID	IRWNIDXC	SILVER STAR TELEPHONE CO., INC.	IRWIN	N
ID	WAYNIDXC	SILVER STAR TELEPHONE CO., INC.	WAYAN	N

EXHIBIT 3

Current Lifeline Offering

Q LINK WIRELESS LIFELINE OFFERING EFFECTIVE 12/1/2019

LIFELINE NON-TRIBAL:

1000 Minutes & 3 GB Data (Q LINK ALWAYS ON)

1000 anytime minutes per month

Unlimited text and picture messaging

3 GB data per month

Minutes & data do not rollover

Net cost to Lifeline customer: **\$0**

LIFELINE TRIBAL:

Unlimited Talk & Text & 3 GB Data (Q LINK ALWAYS ON TRIBAL)

Unlimited anytime voice minutes per month

Unlimited text and picture messaging

3 GB data per month (*no rollover*)

Net cost to Tribal Lifeline customer: **\$0**

ADDITIONAL AIRTIME

Available for purchase at <https://qlinkwireless.com/members/cart/quickpurchase.aspx>

All packages include:

- Free Wi-Fi enabled Smartphone, or data-capable tablet/hotspot device for qualified applicants
- Free calls to Q LINK Customer Service
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra cost