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April 10, 2020

VIA ELECTRONIC DELIVERY

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
04/10/20 13:36
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket No. UT-130702
Q LINK WIRELESS, LLC
Lifeline Biennial Audit Report Filing Pursuant to 47 C.F.R. § 54.420

Dear Mr. Johnson:

Pursuant to 47 C.F.R. § 54.420 of the Federal Communications Commission's ("FCC") rules, Q LINK WIRELESS, LLC ("Q LINK") provides a copy of its Lifeline Biennial Audit Report ("Report") as issued February 27, 2020 and filed with the FCC on April 9, 2020. This Report covers the audit period of January 1, 2017 through December 31, 2017.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/ KATIE ZACK

Katie Zack
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Attachments

cc: Maybell Kelly

Independent Accountants' Report
On Applying Agreed-Upon Procedures
Q Link Wireless, LLC

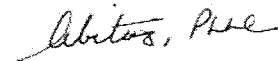
To the Managements of Q Link Wireless, LLC, the Universal Service Administrative Company (USAC), and the Federal Communications Commission (FCC or Commission):

We have performed the procedures enumerated in Attachment A, which were agreed to by the FCC's Wireline Competition Bureau (Bureau) and Office of Managing Director (OMD) in the Lifeline Biennial Audit Plan or as otherwise directed by the Bureau, solely to assist you in evaluating Q Link Wireless LLC's compliance with certain regulations and orders governing the Low Income Support Mechanism (also known as the Lifeline Program) of the Universal Service Fund, set forth in 47 C.F.R. Part 54, as well as other program requirements, including any state-mandated Lifeline requirements (collectively, the Rules) detailed in the Lifeline Biennial Audit Plan for the calendar year ended December 31, 2017. Q Link Wireless, LLC's management is responsible for compliance with the Rules. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the Generally Accepted Government Auditing Standards (GAGAS) issued by the Government Accountability Office (2011 Revision). The sufficiency of these procedures is solely the responsibility of the Bureau and OMD. Consequently, we make no representation regarding the sufficiency of the procedures described in Attachment A either for the purpose for which this report has been requested or for any other purpose.

Specific procedures and related results are enumerated in Attachment A to this report. In compliance with the Lifeline Biennial Audit Plan, this report does not contain any personally identifiable information or individually identifiable customer proprietary network information.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on Q Link Wireless LLC's compliance with the Rules. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the managements of Q Link Wireless, LLC, USAC, and the FCC, and is not intended to be and should not be used by anyone other than these specified parties. This report becomes a matter of the public record upon filing of the final report with the FCC. The final report is not confidential.



Abitos, PLLC

Coral Gables, FL

February 27, 2020

Agreed-Upon Procedures Report - Attachment A

Attachment A enumerates the agreed-upon procedures for Q Link Wireless, LLC ("Q Link"), the associated results, and any management responses obtained in relation to the exceptions identified.

OBJECTIVE I: Carrier Obligation to Offer Lifeline

To determine if the Eligible Telecommunications Carrier ("ETC") has procedures in place to make Lifeline services available to qualifying low-income consumers with mandated disclosures regarding requirements to participate in the Lifeline program and procedures for de-enrolling subscribers when they are no longer eligible to receive Lifeline services.

Procedures and findings

1. Abitos, PLLC inquired of management and obtained Carrier policies and procedures for offering Lifeline service to qualifying low-income consumers as provided by the Carrier in response to Item 4 of Appendix A (Requested Documentation). We examined and compared the Carrier policies and procedures, including any management responses, with the Commission's Lifeline rules set forth in Appendix F.

The FCC released the 2015 and 2016 Lifeline orders to implement the recordkeeping requirements, de-enrolling subscribers for non-usage, non-usage termination notification, lifeline benefit portability, minimum standards requirements and annual certification. Q Link did update company rules, policies and implemented the procedures company-wide on the effective date of new implementation as required by FCC 2015 and 2016 Lifeline orders. However, Q Link did not update the FCC compliance plan filed in 2012 to make the amendment or add in the carrier's policy document for the new implementation since there is no such procedure or mechanism by the FCC to amend.

2. Abitos, PLLC inspected 10 examples of Carrier marketing materials describing the Lifeline service (i.e., print, audio, video and Internet materials used to describe or enroll in the Lifeline service offering, including standard scripts used when enrolling new subscribers, and application and certification forms), as provided in response to Items 4, 6, and 7 of Appendix A, and noted if the materials did not include the following:
 - i. The service is a Lifeline service, which is a government assistance program;
 - ii. The service is non-transferable;
 - iii. Only eligible subscribers may enroll;
 - iv. Only one Lifeline discount is allowed per household; and
 - v. Q LINK's name or any brand names used to market the service.

Abitos, PLLC noted that the inspected marketing materials contained the required information without exception.

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3.
 - a. Abitos, PLLC reviewed the Carrier's responses to the background questionnaire regarding the Carrier's policies for (1) how subscribers notify the Carrier of the subscriber's intent to cancel service or give notification that s/he is no longer eligible to receive Lifeline service and (2) when de-enrollment for such notifications occurs. We verified that these policies are designed to (1) allow subscribers to make the notifications required by 47 C.F.R. § 54.410(d)(3)(ii) and (iv) and (2) prevent the Carrier from claiming ineligible subscribers on the FCC Form 497 or subscribers who wish to cancel service.
 - b. In addition, Abitos, PLLC called the customer care numbers provided in response to Item 8 of Appendix A. We noted no additional customer care numbers in the marketing materials provided in response to Item 6 of Appendix A, or on the websites provided in response to Item 7 of Appendix A. Abitos, PLLC notes that (1) each telephone number is operational, and (2) though it uses an interactive voice response (IVR) system, it is possible for an individual to reach a live customer care operator.
4. Abitos, PLLC inspected applicable policies and procedures regarding de-enrollment from the program, including when Q Link will de-enroll subscribers based on lack of eligibility, duplicative support, non-usage, and failure to recertify, as further described below:
 - a. Abitos, PLLC inspected Q Link's policy and procedures for de-enrollment where Q Link has information indicating that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer under 47 C.F.R. § 54.409, as provided in response to Item 4 of Appendix A, as well as de-enrollment letters provided in response to Item 11 of Appendix A. We noted whether the policy and procedures detail the process for communications between the subscriber and ETC regarding de-enrollment, including, but not limited to: (1) notifying subscribers of impending termination of service; (2) allowing subscriber to demonstrate continued eligibility; and (3) termination of service within 30 days for failure to demonstrate eligibility. Based on procedures listed above, Abitos, PLLC did not identify any areas that are not in compliance with 47 C.F.R. § 54.405(e)(1) of the Commission's rules.
 - b. Abitos, PLLC inspected the Carrier's policy and procedures for de-enrolling subscribers that are receiving Lifeline service from another ETC or where more than one member of a subscriber's household is receiving Lifeline service (duplicative support). Abitos, PLLC noted that the policy and procedures state that Q Link will de-enroll subscribers within 5 business days of receiving notification from USAC program management that a subscriber or a subscriber's household is receiving duplicative Lifeline support, as required by 47 C.F.R. § 54.405(e)(2) of the Commission's rules. No exceptions were noted.
 - c. Abitos, PLLC inspected the Carrier's policy and procedures for de-enrolling subscribers for non-usage (i.e., where a Lifeline subscriber fails to use Lifeline service for 30 consecutive days), including the process of how the Carrier monitors and identifies subscribers who are non-users of Lifeline service but enrolled in the program, as well as non-usage termination notifications provided in response to Item 18 of Appendix A. We examined the policy and procedures and non-usage termination notifications to verify if the termination notifications

Agreed-Upon Procedures Report - Attachment A

explain that the subscriber has 15 days following the date of the impending termination notification to use the Lifeline service.

FCC shortened non-usage period requirement from 60 days to 30 days and non-usage termination notification from 30 days to 15 days on December 2, 2016. Q Link did update company rules, policies and implemented the procedures company-wide on December 2, 2016 as required by FCC 2016 Lifeline orders. However, Q Link did not update the FCC compliance plan filed in 2012 to make the amendment or add in the carrier's policy document for the new implementation since there is no such procedure to do so. The FCC compliance plan does acknowledge that Q Link would adhere to future rule changes which Q Link did.

- d. Abitos, PLLC reviewed the Carrier's policy and procedures for de-enrolling a Lifeline subscriber that does not respond to the Carrier's attempts to obtain recertification, as part of the annual eligibility recertification process, as well as recertification requests provided in response to Item 19 of Appendix A. We examined the policy and procedures and recertification requests to verify if the communications explain that the subscriber has 60 days following the date of the notice to demonstrate continued eligibility or the Carrier will terminate the subscriber's Lifeline service. In addition, Abitos, PLLC examined the recertification requests and the Carrier's responses to the background questionnaire and verified that the recertification requests were sent by a method separate from the subscriber's bill (if a customer receives a bill from the Carrier). Abitos, PLLC did not identify any areas that are not in compliance with 47 C.F.R. § 54.405(e)(4) of the Commission's rules.

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OBJECTIVE II: Consumer Qualification for Lifeline

To determine if the ETC has procedures in place to limit Lifeline service to qualifying low-income consumers and ensure that Lifeline service is limited to a single subscription per household.

Procedures and findings

1. Abitos, PLLC reviewed procedures the Carrier has in place to ensure it has accurately completed the FCC Form 497. Because the Carrier does not have such procedures, we inquired of management to describe the process for completing a FCC Form 497. Specifically, we inquired if the process included the following required elements:

- The name and position title of the person responsible for obtaining data for the FCC Form 497;
- The name and position title of the person responsible for certifying the FCC Form 497 and whether this individual is a corporate officer of the Q Link;
- Provided the billing system name used to generate completion of the form;
- The process for determining which subscribers should be included monthly in the FCC Form 497. Document whether the procedures include cut-off or billing cycle dates, subscribers active as of the start or end of the month, etc.;
- The process for completing each portion of the FCC Form 497, including non-Tribal Lifeline; and
- That a verification process exists to perform an independent review, that is, the person reviewing or validating the form's data is different from the person completing the form;

The process included all of the required elements without exception.

2. Abitos, PLLC obtained the Subscriber List in response to Item 1 of Appendix A and obtained the Carrier's FCC Form 497(s) for each study area in selected states of Louisiana, Maine, and Ohio for September of 2017. We compared the number of subscribers reported on the Form 497(s) to the number of subscribers contained on the Subscriber List for each study area. Abitos, PLLC noted no discrepancies in the number of subscribers.

3. Abitos, PLLC obtained from Q Link the NLAD subscriber listing for subscribers active for each study area in the selected states of Louisiana, Maine, and Ohio for September of 2017. Abitos, PLLC compared the NLAD subscriber listing to the FCC Form 497 subscriber listing. Abitos, PLLC noted no discrepancies in the number of subscribers.

4. Abitos, PLLC inquired of management and obtained Carrier policies and procedures for limiting Lifeline support to a single subscription per household as provided by the Carrier in response to Item 4 of Appendix A. We examined and compared the Carrier policies and procedures, including

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any management responses, with the Commission's Lifeline rules set forth in 47 C.F.R. § 54.409(c) (Appendix F). Abitos, PLLC did not note any discrepancies between the policies and procedures and the Commission's rule.

5. Abitos, PLLC used computer-assisted audit techniques to examine the Subscriber List and note duplicate addresses with different subscribers for the three selected states of Louisiana, Maine, and Ohio, for September of 2017, combined the listings and used computer-assisted audit techniques to determine addresses that had multiple subscribers. Abitos, PLLC found 28,175 subscribers on duplicate addresses.
6. From the list completed in #5 above, Abitos, PLLC randomly selected 30 subscribers and requested the copies of one-per-household certification form for each of the selected subscribers using Appendix D. Because subscribers must only complete a one-per-household certification form if existing Lifeline recipients reside at the same address, the selected subscribers were not the first subscribers residing at the address based on the Lifeline start date in the subscriber listing. Abitos, PLLC verified that the provided one-per-household documentation included the following requirements and the selected subscribers certified to only receiving one Lifeline-supported service in his/her household:
 - a. An explanation of the Commission's one-per-household rule;
 - b. A check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households;
 - c. A space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income; and
 - d. The penalty for a consumer's failure to make the required one-per-household certification (i.e., de-enrollment).

Abitos, PLLC noted that all the above requirements were included in the one-per-household certification form without exception.

Even if subscribers enrolled in the program prior to June 2012, the effective date of the one-per-household requirement, at least one subscriber at each address is required to complete a one-per-household certification form. Abitos, PLLC noted no missing or incomplete certifications.

Agreed-Upon Procedures Report - Attachment A

OBJECTIVE III: Subscriber Eligibility Determination and Certification

To determine if the ETC implemented policies and procedures for ensuring that their Lifeline subscribers are eligible to receive Lifeline services.

Procedures and findings

1. Abitos, PLLC inquired of management and obtained Carrier policies and procedures for ensuring that its Lifeline subscribers are eligible to receive Lifeline services as provided by the Carrier in response to Item 4 of Appendix A. We examined and compared the Carrier policies and procedures with the Commission's Lifeline rules set forth in 47 C.F.R. §54.409 and 54.410 (Appendix F).
 - a. Abitos, PLLC inspected Q Link's policies and noted that it includes a policy or procedure in which Q Link must fully verify the eligibility of each low-income consumer prior to providing Lifeline service to that consumer and that Q Link or its agents may not provide the consumer with an activated device intended to enable access to Lifeline service until that consumer's eligibility is fully verified and all other necessary enrollment steps have been completed.
 - b. Abitos, PLLC inspected Q Link's policies to determine the process for ensuring subscribers are eligible to receive Lifeline services and have completed all forms necessary to receive service.
 - c. Abitos, PLLC examined Q Link's policies and procedures for training employees and agents for ensuring that Q Link's Lifeline subscribers are eligible to receive Lifeline services, including any policies regarding how the company ensures employees and agents have completed the training. We inquired of management about the timing, frequency and evidence of completion of the initial and any subsequent Lifeline subscriber eligibility and certification training requirement for the Q Link's employee. In addition, we also observed a training class conducted at Q Link. Management also describe the process for training employees and agent. The employees and agents are given training manuals which includes training material on training Q Link system, NLAD and state database. Q Link employees are required to complete eligibility and enrollment training, before being allowed to review and approve subscribers' eligibility criteria. Q Link employees are required to undergo in-person training and follow Q Link guidelines under management supervision.
2. Abitos, PLLC randomly selected 100 subscribers from the Subscriber List, and performed the tests described below:
 - a. Abitos, PLLC examined the subscriber certification and recertification forms for the selected 100 subscribers and verified that the forms contained the following information:
 - i. Lifeline is a federal benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment, or being barred from the program;
 - ii. Only one Lifeline service is available per household;

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- iii. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- iv. A household is not permitted to receive Lifeline benefits from multiple providers;
- v. Violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the subscriber's de-enrollment from the program;
- vi. Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person;
- vii. Require each prospective subscriber to provide the following information:
 - 1. The subscriber's full name;
 - 2. The subscriber's full residential address;
 - 3. Whether the subscriber's residential address is permanent or temporary;
 - 4. The subscriber's billing address, if different from the subscriber's residential address;
 - 5. The subscriber's date of birth;
 - 6. The last 4 digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
 - 7. If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in 47 C.F.R. § 54.409, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits; and
 - 8. If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in 47 C.F.R. § 54.409, the number of individuals in his or her household.
- viii. Require each prospective subscriber to certify, under penalty of perjury, that:
 - 1. The subscriber meets the income or program-based eligibility criteria for receiving Lifeline, provided in 47 C.F.R. §54.409;
 - 2. The subscriber will notify Q Link within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income or program-based criteria for receiving Lifeline service, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit;

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3. If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in 47 C.F.R. § 54.400(e);
4. If the subscriber moves to a new address, he or she will provide that new address to Q Link within 30 days;
5. The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
6. The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge;
7. The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
8. The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to 47 C.F.R. § 54.405(c)(4).

Exception noted:

Q Link's initial certification form does not require the prospective subscriber to provide information relating to the subscriber's billing address, if different from the subscriber's residential address.

Beneficiary response:

Q Link performs many validations prior to approving applicants for Lifeline service. One of those checks includes a USPS address validation, which cannot be accurately performed on billing addresses. For this reason, Q Link only obtains one verifiable residential address as both the billing and the mailing address. If an applicant truly only has a temporary address (such as the address of a temporary shelter, or a friend or family member), we collect that verifiable address. The address we collect (whether permanent or temporary) is used to perform a duplicate check, to verify that no other Lifeline service is provided at that household, meeting the one-per-household requirement. Furthermore, on some temporary addresses, since we are unable to perform accurate validation checks on billing addresses, it's possible that the same billing address could be used on multiple Lifeline accounts, which Q Link views as a potential sign of fraud; this is why Q Link does not approve these accounts. We also wish to prevent applicants from providing a residential address other than their own and then providing their correct address for shipping/billing purposes to avoid compliance with the one-per-household rule. Therefore, we avoid waste, fraud, and abuse by requesting only one address.

Agreed-Upon Procedures Report - Attachment A

- b. Abitos, PLLC compared Q Link's subscriber eligibility criteria on the certification and recertification forms to the federal eligibility criteria listed in per 47 C.F.R. § 54.409. Abitos, PLLC did not note any discrepancies.
- c. Abitos, PLLC verified the subscriber completed all the required elements as identified in Objective III – 2 a. above, including signature and initialing/checkbox requirements contained in the certification and recertification forms.
- d. Abitos, PLLC examined the subscriber's certification/recertification form to verify the forms are dated prior to the end of the selected Form 497 data month. If the provided subscriber certification/recertification form was the subscriber's initial certification form, we verified that the form is dated prior to or on the same day as the Lifeline start date per the subscriber listing. No discrepancies were noted.
- e. Abitos, PLLC noted that no subscribers certified to residing on Tribal lands.
- f. Abitos, PLLC reviewed the eligibility documentation the Q Link reviewed to confirm the subscriber's eligibility obtained using Appendix E. We verified the recorded data sources are eligible data sources per 47 C.F.R. § 54.410, such as (1) income or program eligibility databases, (2) income or program eligibility documentation, or (3) confirmation from a state administrator.

Exception noted:

Abitos, PLLC noted that one subscriber from Ohio did not provide three consecutive months proof of income, and Q Link claimed \$9.25 reimbursement from USAC for the month of September 2017.

Agreed-Upon Procedures Report - Attachment A

OBJECTIVE IV: Annual Certifications and Recordkeeping by Eligible Telecommunications Carriers

To determine if ETCs have made and submitted to the Universal Service Administrative Company the required annual certifications, under penalty of perjury, relating to the Lifeline program by an officer of the company and maintained recordkeeping requirements.

Procedures

1. Abitos, PLLC inquired of management and obtained Carrier policies and procedures for ensuring that the Carrier has made and submitted the annual certifications required under 47 C.F.R. § 54.416 (i.e., FCC Form 555) and 47 C.F.R. § 54.422 (i.e., FCC Form 481) of the Commission's rules, as provided by the Carrier in response to Items 4 of Appendix A. We examined and compared the Carrier policies and procedures, including any management responses, with the Commission's Lifeline rules set forth in 47 C.F.R. § 54.416 and 47 C.F.R. § 54.422 (Appendix F).

Abitos, PLLC examined and compared the Carrier policies and procedures, including any management responses, with the Commission's Lifeline rules set forth in 47 C.F.R. § 54.416 and 47 C.F.R. § 54.422. Abitos, PLLC noted no discrepancies between the policies and procedures and the Commission's rules.

2. Abitos, PLLC examined Q Link's FCC Form 555 that was filed the January following the audit period provided by the Carrier in response to Item 12 of Appendix A. We verified that the carrier made all of the following certifications. We verified that an officer of Q Link certified that he/she understands the Commission's Lifeline rules and requirements and that the Carrier:
 - a. Has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services;
 - b. Is in compliance with all federal Lifeline certification procedures; and
 - c. In instances where an ETC confirms consumer eligibility by relying on income or eligibility databases, as defined in 47 C.F.R. § 54.410(f)(2)(i)-(ii), or by relying on a state Lifeline administrator, as defined in 47 C.F.R. § 54.410(f)(3), the representative must attest annually as to what specific data sources the ETC used to confirm eligibility.

Abitos, PLLC verified all required elements without exception.

3. Abitos, PLLC examined Q Link's organizational chart provided by the Carrier in response to Item 5 of Appendix A. We verified that the certifying officer on the FCC Form 555 is an officer per the organizational chart.
4. Abitos, PLLC verified that the recertification data reported on the FCC Form 555 agrees with the detailed recertification results provided by the Carrier in response to Item 9 of Appendix A without exception.
5. Abitos, PLLC verified that the non-usage data reported on the FCC Form 555 for the selected month of September 2017, agreed with the detailed non-usage results provided by the Carrier in response to Item 10 of Appendix A without exception.

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6. Abitos, PLLC reviewed the Carrier's Form 481, as provided by the Carrier in response to Item 13 of Appendix A. We verified that Q Link reported all the information and made all the certifications required by 47 C.F.R. § 54.422(a)(b) without exception.
7. Abitos, PLLC reviewed any supporting schedules related to the Carrier's FCC Form 481 as provided by the Carrier in response to Items 16 and 17 of Appendix A. As Q Link was not granted the ETC designation by the FCC, schedules supporting the number of outages and complaints are not required.
8. Abitos, PLLC inquired of management of the Carrier policies and procedures for maintaining records that document compliance with the Lifeline program rules, as provided by the Carrier in response to Item 4 of Appendix A and compared the management response, with recordkeeping rules set forth in 47 C.F.R. § 54.417.

FCC implemented new rules for recordkeeping and retention on February 7, 2016. Q Link did update company rules, policies and implemented the procedures company-wide on February 7, 2016 as required by FCC 2015 Lifeline orders. However, Q Link did not update the FCC compliance plan filed in 2012 to make the amendment or add in the carrier's policy document for the new implementation since there is no such procedure or mechanism by the FCC to amend.