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February 27, 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  
02/27/20 15:16  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Re: Q LINK WIRELESS LLC - Petition to Expand ETC Service Area

Dear Mr. Johnson:

Attached please find for filing the Petition of Q LINK WIRELESS LLC to expand its Eligible Telecommunications Carrier service area.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me at 770-232-9200 or [hkirby@telecomcounsel.com](mailto:hkirby@telecomcounsel.com). Thank you for your attention to this matter.

Respectfully submitted,

*s/ Heather Kirby*

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

*Attorneys for Q LINK WIRELESS LLC*

Attachments

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	
	)	
Q LINK WIRELESS LLC	)	Docket No.
	)	
to expand its Eligible Telecommunications	)	
Carrier service area	)	

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

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February 27, 2020

## 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”), sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”), and Section 480-123-030 of the Washington Administrative Code (“WAC”), hereby petitions the Washington Utilities and Transportation Commission (“Commission”) to expand Q LINK’s Eligible Telecommunications Carrier (“ETC”) service area in the State of Washington (“Petition”). Q LINK seeks expansion of its ETC designated service area that is statewide in scope, to allow the Company to provide Lifeline service wherever its underlying facilities-based providers have wireless coverage.

On December 12, 2013, Q LINK was designated as a Lifeline-only ETC in Washington by Commission Order in Docket UT-130702.<sup>1</sup> As demonstrated by the facts stated herein, and as certified in Exhibit 1 attached hereto, Q LINK continues to meet all statutory and regulatory requirements for designation as an ETC, including those in recent Orders adopted by the FCC.<sup>2</sup>

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<sup>1</sup> *In the Matter of the Petition of Q LINK WIRELESS LLC, Petitioner, Seeking Designation as an Eligible Telecommunications Carrier in the State of Washington pursuant to 47 U.S.C. § 214(e)(2) (Low Income Only)* (“ETC Petition”), Order 01 Granting Eligible Telecommunications Carrier Designation with Conditions and Exemption from Rule, Docket No. UT-130702 (December 12, 2013) (“ETC Designation Order”).

<sup>2</sup> *See 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) (“*Lifeline Modernization Order*”); *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*”).

The Company does not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high-cost areas. Prompt approval 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 Washington. Accordingly, Q LINK respectfully requests that the Commission expeditiously approve this Petition.

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

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Managing Attorney  
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## **II. DESIGNATED SERVICE AREA**

In the ETC Designation Order, the Commission designated Q LINK as an ETC in the State of Washington throughout the exchanges listed in Appendix B attached thereto. Q LINK currently provides wireless Lifeline service to eligible Washington Lifeline customers utilizing the wireless networks of Sprint Spectrum L.P. (“Sprint”) and/or T Mobile USA, Inc. (“T-Mobile”). Through its agreement with these underlying carriers, Q LINK provides its customers the same ability to remain functional in emergency situations as currently provided by Sprint and T-Mobile to their 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.

Q LINK now files this Petition seeking approval to expand its ETC-designated service area to include additional areas, which encompass non-rural and rural service areas and include federally-recognized tribal lands, in which its underlying carriers have sufficient coverage. Q LINK's proposed ETC service area is described in attached Exhibit 2 using a current zip code coverage list along with an updated list of corresponding exchanges.

### **III. Q LINK MEETS APPLICABLE REQUIREMENTS**

Sections 54.201-54.202 of the FCC's rules set forth the information that must be contained in an application for designation as an ETC (the "FCC ETC Rules"). In its ETC Petition, Q LINK provided the information required by WAC 480-123-030 and FCC ETC Rules in effect at the time. Q LINK incorporates the information in those filings by reference herein. In the Commission's ETC Designation Order, it found that Q LINK satisfied the requirements for designation as an ETC and designated Q LINK as an ETC subject to the conditions set out in Appendix A attached thereto. 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 its receipt of federal Lifeline support.

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 Washington, including broadband Internet access service ("BIAS"). Q

LINK's current Lifeline-supported service offering, appended as Exhibit 3, satisfies the minimum service standards set forth in 47 C.F.R. § 54.408. Q LINK also commits that its Lifeline-supported services will continue to meet or exceed the federal minimum service standards, including future changes.

#### **IV. Q LINK REQUESTS EXEMPTION FROM CERTAIN PROVISIONS OF WAC 480-123-030**

In the ETC Designation Order, the Commission exempted Q LINK from the following ETC petition requirements set forth in WAC 480-123-030(1)(d), (f) and (g):

Subsection (d) requires ETCs to provide a substantive plan of the investments it will make using USF funds. This requirement applies to carriers that seek high-cost support to fund investments to their networks; however, Q LINK's ETC designation is solely for purposes of reimbursement for provision of subsidized low-income support services to eligible customers. Therefore, the Company has no basis for filing an investment plan and should continue to be exempt from the requirement.

Subsection (f) requires wireless carriers to provide a map in .shp format of proposed service areas (exchanges) with existing and planned locations of cell sites and shading to indicate where the carrier provides and plans to provide commercial mobile radio service signals. Q LINK does not own, control, nor plan to develop cell sites, and the Company's coverage area encompasses that of its underlying carriers in Washington. Q LINK does not have access to the underlying carriers' lists of geographic service areas or maps of service area showing the location of cell sites, and has been unable to attain network coverage maps from its underlying carriers due to non-

disclosure agreements. Accordingly, Q LINK requests exemption from the requirement to provide coverage maps.

Subsection (g) provides that a petition for ETC designation must contain information affirming that a company has the ability to remain functional in emergency situations, including information that demonstrates it has at least four hours of backup battery power at each cell site, backup generators at each microwave hub, and at least five hours of backup battery power and backup generators at each switch. As noted herein, Q LINK has the ability to remain functional in emergency situations through its underlying carriers. Q LINK does not own or operate any facilities, cell sites or microwave hubs, thus, Q LINK should be exempt from the requirement that it demonstrate it has backup battery power or generators.

The ETC Designation Order stated that Q Link had demonstrated that the requirements of WAC 490-123-030(1)(d), (f), and (g) should not apply to the Company and that granting the requested exemption was in the public interest and consistent with applicable laws and rules. Q LINK thus requests the same exemptions on the same basis, to the extent required for the instant Petition.

**V. Q LINK'S PROVISION OF SERVICE TO ADDITIONAL RESIDENTS WOULD PROMOTE THE PUBLIC INTEREST**

In the ETC Designation Order, the Commission found that designation of Q LINK as an ETC would serve the public interest. Expanding Q LINK's service area will further the public interest by allowing even more low-income Washington consumers to have access to low-priced and high-quality services. Q LINK's prepaid wireless plans enable eligible consumers to enjoy the

benefits of wireless telecommunication without being subject to extensive credit reviews and long-term service commitments, which historically have prevented many low-income Americans, including many Washington 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. 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'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 plan options meeting the voice and/or broadband minimum service standards), at no net cost to the customer after application of Lifeline support. 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.



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.<sup>3</sup> 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 trusted steward with public resources. Notably, Q LINK has successfully passed fifty-four (54) routine government audits led by the Universal Service Administrative Company (USAC) or state audits with no instances of duplicates in those audits. Q LINK's automated model, and its patent-pending kiosks once deployed, allow Q LINK to make wireless Lifeline available in less dense areas that have not been a focus of other Lifeline providers. Q LINK's business model is unique in that the Company is able to reach unserved and underserved Lifeline-eligible consumers; in fact, on average, eighty percent (80%) of Q LINK's customers are *new* and have not previously participated in the Lifeline program. Q LINK has best-in-class customer service, satisfaction, and retention, with one of the lowest churn (customer turnover) rates in the industry.

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

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<sup>3</sup> See *Fifth Report and Order*, ¶168.

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 Washington where its underlying carriers have sufficient coverage undoubtedly promotes the public interest.

## **VI. CONCLUSION**

Q LINK respectfully requests that the Commission promptly approve the instant Petition and expand Q LINK's ETC service area to be statewide in scope, subject to the wireless coverage of the Company's underlying facilities-based providers.

Respectfully submitted,

*s/ Lance J.M. Steinhart*

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*Attorneys for Q LINK WIRELESS LLC*

February 27, 2020

**EXHIBIT 1**

**Certification**

**CERTIFICATION**

I, Issa Asad, hereby depose and state under penalty of perjury that I am the Chief Executive Officer (“CEO”) of Q LINK WIRELESS LLC (“Q LINK”); that I have read the foregoing Petition 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.

Executed on February 27, 2020

Broward County, Florida

Q LINK WIRELESS LLC

By:   
\_\_\_\_\_

Issa Asad, CEO

## **EXHIBIT 2**

### **Service Area**

ZIP CODES IN Q LINK'S COVERAGE AREA - WASHINGTON

98001	98055	98127	98213	98275	98340	98395
98002	98056	98129	98220	98276	98342	98396
98003	98057	98131	98221	98277	98343	98401
98004	98058	98132	98222	98278	98344	98402
98005	98059	98133	98223	98279	98345	98403
98006	98061	98134	98224	98280	98346	98404
98007	98062	98136	98225	98281	98348	98405
98008	98063	98138	98226	98282	98349	98406
98009	98064	98139	98227	98283	98351	98407
98010	98065	98141	98228	98284	98352	98408
98011	98068	98144	98229	98286	98353	98409
98012	98070	98145	98230	98287	98354	98411
98013	98071	98146	98231	98288	98355	98412
98014	98072	98148	98232	98290	98356	98413
98015	98073	98151	98233	98291	98358	98415
98019	98074	98154	98235	98292	98359	98416
98020	98075	98155	98236	98293	98360	98417
98021	98077	98158	98237	98294	98361	98418
98022	98082	98160	98238	98295	98362	98419
98023	98083	98161	98239	98296	98363	98421
98024	98087	98164	98240	98297	98364	98422
98025	98089	98165	98241	98303	98365	98424
98026	98092	98166	98244	98304	98366	98430
98027	98093	98168	98245	98305	98367	98431
98028	98101	98170	98247	98310	98368	98433
98029	98102	98171	98248	98311	98370	98438
98030	98103	98174	98249	98312	98371	98439
98031	98104	98175	98250	98314	98372	98442
98032	98105	98177	98251	98315	98373	98443
98033	98106	98178	98252	98320	98374	98444
98034	98107	98181	98253	98321	98375	98445
98035	98108	98184	98255	98322	98376	98446
98036	98109	98185	98256	98323	98377	98447
98037	98110	98188	98257	98324	98378	98448
98038	98111	98189	98258	98325	98380	98450
98039	98112	98190	98259	98326	98381	98455
98040	98113	98191	98260	98327	98382	98460
98041	98114	98194	98261	98328	98383	98464
98042	98115	98195	98262	98329	98384	98465
98043	98116	98198	98263	98330	98385	98466
98045	98117	98199	98264	98331	98386	98467
98046	98118	98201	98266	98332	98387	98471
98047	98119	98203	98267	98333	98388	98477
98050	98121	98204	98270	98335	98390	98481
98051	98122	98205	98271	98336	98391	98490
98052	98124	98206	98272	98337	98392	98492
98053	98125	98207	98273	98338	98393	98493
98054	98126	98208	98274	98339	98394	98496

ZIP CODES IN Q LINK'S COVERAGE AREA - WASHINGTON

98497	98572	98642	98836	98952	99129	99256
98498	98575	98643	98837	98953	99130	99258
98499	98576	98644	98843	99001	99134	99260
98501	98577	98645	98845	99003	99135	99299
98502	98579	98647	98846	99004	99137	99301
98503	98580	98648	98847	99005	99141	99302
98504	98581	98649	98848	99006	99148	99320
98505	98582	98650	98850	99008	99149	99321
98506	98583	98651	98851	99009	99156	99322
98507	98584	98660	98852	99011	99158	99323
98508	98585	98661	98853	99012	99159	99324
98509	98588	98662	98856	99013	99161	99326
98511	98589	98663	98857	99014	99163	99328
98512	98591	98664	98858	99016	99164	99329
98513	98592	98665	98860	99017	99169	99330
98516	98593	98666	98901	99018	99170	99336
98520	98595	98667	98902	99019	99171	99337
98524	98596	98668	98903	99020	99173	99338
98528	98597	98671	98904	99021	99174	99341
98530	98599	98672	98907	99022	99176	99343
98531	98601	98673	98908	99023	99179	99344
98532	98603	98674	98909	99025	99180	99345
98533	98604	98675	98920	99026	99181	99346
98535	98605	98682	98921	99027	99201	99347
98536	98606	98683	98922	99029	99202	99348
98537	98607	98684	98923	99030	99203	99349
98538	98609	98685	98925	99031	99204	99350
98540	98610	98686	98926	99032	99205	99352
98541	98611	98687	98929	99033	99206	99353
98542	98612	98801	98930	99034	99207	99354
98544	98613	98802	98932	99036	99208	99356
98546	98614	98807	98933	99037	99209	99357
98547	98616	98811	98934	99039	99210	99360
98548	98617	98813	98935	99040	99211	99361
98550	98619	98814	98936	99101	99212	99362
98555	98620	98815	98937	99102	99213	99363
98556	98621	98816	98938	99104	99214	99401
98557	98622	98817	98939	99107	99215	99402
98558	98624	98821	98940	99109	99216	99403
98559	98625	98822	98941	99110	99217	
98560	98626	98823	98942	99111	99218	
98562	98629	98824	98943	99113	99219	
98563	98631	98826	98944	99114	99220	
98564	98632	98828	98946	99115	99223	
98568	98635	98830	98947	99122	99224	
98569	98638	98831	98948	99125	99228	
98570	98639	98832	98950	99126	99251	
98571	98640	98834	98951	99128	99252	

<b>ILEC</b>	<b>EXCHANGE</b>	<b>NOTES</b>
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ALMIRA	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CHEWELAH	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CRESTON	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	DAVENPORT	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ELMA	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FOX ISLAND	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	HUNTERS	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LKQUINAULT	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LONG BEACH	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	PACIFICBCH	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SNOQUMPASS	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SOUTH BEND	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	WINTHROP	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	YACOLT	NEW
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	WASHTUCNA	REMOVE
ELLENSBURG TELEPHONE CO.	KITTITAS	NEW
ELLENSBURG TELEPHONE CO.	SELAH	NEW
ELLENSBURG TELEPHONE CO.	THORP	NEW
ELLENSBURG TELEPHONE CO.	VANTAGE	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BELLEVUE	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BRIDGEPORT	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	DOUGLASCO	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	FARMINGTON	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GRAYHARBCO	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAKESDALE	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SEATTLE	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	TONASKET	NEW
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WOODLAND	NEW
HAT ISLAND TELEPHONE CO.	HAT ISLAND	NEW
INLAND TELEPHONE CO.	CLE ELUM	NEW
LEWIS RIVER TELEPHONE COMPANY, INC.	AMBOY	NEW
LEWIS RIVER TELEPHONE COMPANY, INC.	COUGAR	NEW
LEWIS RIVER TELEPHONE COMPANY, INC.	YALE	NEW
PEND OREILLE TELEPHONE COMPANY	CUSICK	NEW
PIONEER TELEPHONE CO.	LACROSSE	NEW
QWEST CORPORATION	CLARKSTON	NEW
QWEST CORPORATION	CRYSTAL MT	NEW
QWEST CORPORATION	DAYTON	NEW
QWEST CORPORATION	OROVILLE	NEW
QWEST CORPORATION	PASCO	NEW
QWEST CORPORATION	POMEROY	NEW
QWEST CORPORATION	TOUCHET	NEW
QWEST CORPORATION	WALLAWALLA	NEW
QWEST CORPORATION	WHATCOMCTY	NEW
SKYLINE TELECOM COMPANY - WA	SNOHOMISH	NEW
TENINO TELEPHONE CO.	BUCODA	NEW
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GLENWOOD	NEW
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	SUNNYSIDE	NEW
WESTGATE COMMUNICATIONS, LLC DBA WEAVTEL - WA	WENATCHEE	NEW
YCOM NETWORKS, INC.	RAINIER	NEW



<b>ILEC</b>	<b>EXCHANGE</b>	<b>NOTES</b>
ASOTIN TELEPHONE CO.	ANATONE	EXISTING
ASOTIN TELEPHONE CO.	ASOTIN	EXISTING
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	COWICHE	EXISTING
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	RIMROCK	EXISTING
CENTURYTEL OF COWICHE, INC. DBA CENTURYLINK	TIETON	EXISTING
CENTURYTEL OF INTER-ISLAND, INC. DBA CENTURYLINK	SAN JUAN	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	AMES LAKE	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ASHFORD	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	BASIN CITY	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CARNATION	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CATHLAMET	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CHENEY	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CONNELL	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	COULEECITY	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CURTIS	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	EDWALLTYLR	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ELTOPIA	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	EUREKA	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FALL CITY	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FORKS	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	GIG HARBOR	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	HARRINGTON	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	KAHLOTUS	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	KETTLE FLS	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	KINGSTON	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LIND	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MATHEWSCOR	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MEDICAL LK	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MESA	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MONTESANO	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MORTON	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	NORTH BEND	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	OCOSTA	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ODESSA	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ORTING	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	OTHELLO	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	REARDAN	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	RITZVILLE	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SO PRAIRIE	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SPANGLE	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SPRAGUE	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	TWISP	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	VADER	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	VASHON	EXISTING
CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	WILSON CRK	EXISTING
ELLENSBURG TELEPHONE CO.	ELLENSBURG	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BENTONCITY	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BOTHELL	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CAMAS	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GARFIELD	EXISTING

<b>ILEC</b>	<b>EXCHANGE</b>	<b>NOTES</b>
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GEORGE	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	HALLS LAKE	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KENNEWICK	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NACHES	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NEWPORT	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	NILE	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAK HARBOR	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PALOUSE	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PULLMAN	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	QUINCY	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHLAND	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHMND BCH	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROCKFORD	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROSALIA	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SILVERLAKE	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SKYKOMISH	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SNOHOMISH	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SOAP LAKE	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	STEVESPASS	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	TEKOA	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE	EXISTING
FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY	EXISTING
HOOD CANAL TELEPHONE CO.	UNION	EXISTING
INLAND TELEPHONE CO.	DEWATTO	EXISTING
INLAND TELEPHONE CO.	PRESCOTT	EXISTING
INLAND TELEPHONE CO.	ROSLYN	EXISTING
INLAND TELEPHONE CO.	UNIONTOWN	EXISTING
KALAMA TELEPHONE COMPANY	KALAMA	EXISTING
LEWIS RIVER TELEPHONE COMPANY, INC.	LA CENTER	EXISTING
MASHELL TELECOM, INC.	EATONVILLE	EXISTING
MCDANIEL TELEPHONE CO.	MOSSYROCK	EXISTING
MCDANIEL TELEPHONE CO.	SALKUM	EXISTING
PIONEER TELEPHONE CO.	ENDICOTT	EXISTING
QWEST CORPORATION	ABERDEEN	EXISTING
QWEST CORPORATION	AUBURN	EXISTING
QWEST CORPORATION	BAINBDG IS	EXISTING
QWEST CORPORATION	BATTLEGRND	EXISTING
QWEST CORPORATION	BELFAIR	EXISTING
QWEST CORPORATION	BELLEVUE	EXISTING
QWEST CORPORATION	BLACKDIMND	EXISTING
QWEST CORPORATION	BREMERTON	EXISTING
QWEST CORPORATION	BUCKLEY	EXISTING
QWEST CORPORATION	CASTLEROCK	EXISTING
QWEST CORPORATION	CENTRALIA	EXISTING
QWEST CORPORATION	CHEHALIS	EXISTING
QWEST CORPORATION	CLE ELUM	EXISTING
QWEST CORPORATION	COLFAX	EXISTING
QWEST CORPORATION	COLVILLE	EXISTING

<b>ILEC</b>	<b>EXCHANGE</b>	<b>NOTES</b>
QWEST CORPORATION	COPALIS	EXISTING
QWEST CORPORATION	DEER PARK	EXISTING
QWEST CORPORATION	DES MOINES	EXISTING
QWEST CORPORATION	ELK-GRNBLF	EXISTING
QWEST CORPORATION	ENUMCLAW	EXISTING
QWEST CORPORATION	EPHRATA	EXISTING
QWEST CORPORATION	GRAHAM	EXISTING
QWEST CORPORATION	HOODSPORT	EXISTING
QWEST CORPORATION	ISSAQUAH	EXISTING
QWEST CORPORATION	KENT	EXISTING
QWEST CORPORATION	LIBERTY LK	EXISTING
QWEST CORPORATION	LONGVIEW	EXISTING
QWEST CORPORATION	LOON LAKE	EXISTING
QWEST CORPORATION	MAPLE VLY	EXISTING
QWEST CORPORATION	MOSES LAKE	EXISTING
QWEST CORPORATION	NEWMANLAKE	EXISTING
QWEST CORPORATION	OLYMPIA	EXISTING
QWEST CORPORATION	OTHELLO	EXISTING
QWEST CORPORATION	PATEROS	EXISTING
QWEST CORPORATION	PORT ORCH	EXISTING
QWEST CORPORATION	PORTLUDLOW	EXISTING
QWEST CORPORATION	PT ANGELES	EXISTING
QWEST CORPORATION	PTTOWNSEND	EXISTING
QWEST CORPORATION	PUYALLUP	EXISTING
QWEST CORPORATION	RENTON	EXISTING
QWEST CORPORATION	RIDGEFIELD	EXISTING
QWEST CORPORATION	ROCHESTER	EXISTING
QWEST CORPORATION	ROY	EXISTING
QWEST CORPORATION	SEATTLE	EXISTING
QWEST CORPORATION	SHELTON	EXISTING
QWEST CORPORATION	SILVERDALE	EXISTING
QWEST CORPORATION	SPOKANE	EXISTING
QWEST CORPORATION	SPRINGDALE	EXISTING
QWEST CORPORATION	SUMNER	EXISTING
QWEST CORPORATION	TACOMA	EXISTING
QWEST CORPORATION	TACOMAWVLY	EXISTING
QWEST CORPORATION	VANCOUVER	EXISTING
QWEST CORPORATION	WAITSBURG	EXISTING
QWEST CORPORATION	WARDEN	EXISTING
QWEST CORPORATION	WINLOCK	EXISTING
QWEST CORPORATION	YAKIMA	EXISTING
ST JOHN TELEPHONE CO.	ST JOHN	EXISTING
TENINO TELEPHONE CO.	TENINO	EXISTING
TOLEDO TELEPHONE CO., INC.	TOLEDO	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	CHIMACMCTR	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	COLUMBIA	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	DALLESPORT	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GOLDENDALE	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GRANDVIEW	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GRANGER	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	HARRAH	EXISTING

<b>ILEC</b>	<b>EXCHANGE</b>	<b>NOTES</b>
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	HOOD CANAL	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	LYLE	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	MABTON	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	MATTAWA	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PATERSON	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	POULSBO	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PROSSER	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PT ANGELES	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	ROOSEVELT	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	STEVENSON	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	TOPPENISH	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	TROUT LAKE	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WAPATO	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WH SALMON	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WHITE SWAN	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WHITSTRAN	EXISTING
UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WILLARD	EXISTING
WESTERN WAHAKIUM COUNTY TELEPHONE CO.	GRAYS RIVER	EXISTING
WESTERN WAHAKIUM COUNTY TELEPHONE CO.	NASELLE	EXISTING
WHIDBEY TELEPHONE CO.	PT ROBERTS	EXISTING
WHIDBEY TELEPHONE CO.	SO WHIDBEY	EXISTING
YCOM NETWORKS, INC.	YELM	EXISTING

**EXHIBIT 3**

**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**

### 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

### ADDITIONAL AIRTIME

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