

April 10, 2024

VIA E-FILING
Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2145

Re: Comments of Q Link Wireless on Concerning Commissioner Tuma's Proposal
In the Matter of a Review of Q Link Wireless ETC Status
Docket No. P-6883/M-23-383

Dear Mr. Seuffert:

I write on behalf of Q Link Wireless, LLC ("Q Link") in response to Commissioner Tuma's proposed revision concerning Decision Option 1.c.

Q Link appreciates Commissioner Tuma's reasonable and constructive proposal. The only aspect of the amended proposal Q Link opposes is the proposed expansion of a reporting obligation to Q Link's owners and officers. Q Link respectfully suggests this would be inappropriate because it would likely lead to additional reporting for spurious and irrelevant matters, such as disputes between officers and owners in unrelated matters. For instance, the proposed addition could trigger reporting of irrelevant disputes between an officer and a counterparty in a personal business matter, such as a real estate purchase or personal-services contract, in which the counterparty added a fraud claim. Q Link therefore proposes the following minor revision to Commissioner Tuma's proposal striking the only the phrase "and/or its owners and officers" but leaving the rest of the proposed text unchanged:

Describe all criminal, and civil and administrative actions against Q Link and/or its owners and officers related to telecommunications, fraud or misrepresentation (related to ETC designation or otherwise) in any other state or at the federal level pending at any time two years' prior to the date of the annual reports. Provide name of the state or the federal agency, provide the relevant case or docket number(s), provide the date the case was filed or docket was opened, and provide a copy of any final order.

Q Link notes that, revised as proposed here, the reporting obligation covers actions in which Q Link owners or officers are named as co-respondents with Q Link in an action related to telecommunications, fraud or misrepresentation. This would, therefore, cover potentially relevant matters while excluding only extraneous ones where an owner or officer is a respondent but Q Link is not.

Q Link appreciates the Commission's consideration of its views.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patrick O'Donnell", written over a horizontal line.

John T. Nakahata
Patrick O'Donnell
Counsel for Q Link Wireless LLC