

**MINNESOTA PUBLIC UTILITIES COMMISSION
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Commissioner

Minnesota Department of Commerce,

Docket No. _____

Petitioner,

vs.

Q Link Wireless, LLC,

Respondent.

**PETITION OF THE MINNESOTA DEPARTMENT OF COMMERCE FOR
REVOCATION OF ELIGIBLE TELECOMMUNICATIONS CARRIER STATUS**

The Minnesota Department of Commerce, for its petition, pursuant to Minn. R. 7812.1400, subp. 15, to revoke Respondent Q Link Wireless, LLC's status as an Eligible Telecommunications Carrier in Minnesota states as follows:

SUMMARY OF CASE

1. Q Link is an Eligible Telecommunications Carrier ("ETC") in Minnesota.¹ By this petition, the Department requests that Q Link's ETC designation be revoked on the ground that, as the result of Q Link's ongoing fraud in connection with its ETC status, Q Link is no longer eligible to receive federal universal service support and, therefore, is not qualified to continue as an ETC.

¹ See *In re Petition of Q Link Wireless, LLC for Eligible Telecommunications Carrier Designation, in Minnesota*, Docket No. P-6883/M-11-1249, ORDER GRANTING PETITION WITH CONDITIONS, 2 (eDocket No. 20133-84771-01).

THE PARTIES

2. Q Link Wireless, LLC is a wireless telephone services provider. Q Link's principal place of business is 499 E. Sheridan St., Suite 400, Dania, FL 33004. The company's registered business office address is 11575 E. Laketowne Dr., Albertville, MN 55301.

3. The Department is the state agency responsible for enforcing the laws, rules, and orders of the Minnesota Public Utilities Commission. The Department is responsible for enforcing Minnesota Statutes chapters 216A, 216B and 237, and any Commission orders issued pursuant to those chapters. The Department is located at 121 Seventh Pl. E., Suite 280, St. Paul, MN 55101.

FACTS SUPPORTING REVOCATION

4. In 2013, the Commission granted Q Link's petition for designation as an ETC in Minnesota.² Among other obligations, ETCs must offer Lifeline service to qualifying low-income customers.³

5. Lifeline is a federal program that provides subscribers a discount on qualifying monthly telephone service, broadband internet service, or bundled voice-broadband packages.⁴ In exchange for providing discounted service to customers through the Lifeline program, ETCs may receive reimbursement from the Federal Communications Commission ("FCC").⁵

6. As early as 2012, Q Link began intentionally defrauding the federal government by misrepresenting the number of qualifying Lifeline customers. This scheme continued until 2021.⁶ In October 2024, the U.S. Department of Justice announced that Q Link had plead guilty in

² See *In re Petition of Q Link Wireless, LLC for Eligible Telecommunications Carrier Designation in Minnesota*, Docket. No P-6883/M-11-1249, ORDER GRANTING PETITION WITH CONDITIONS (eDocket No. 20133-84771-01).

³ 47 C.F.R. § 54.405(a).

⁴ See generally ORDER GRANTING PETITION WITH CONDITIONS at 1.

⁵ 47 C.F.R. §§ 54.403, .407.

⁶ Decl. of Lisa Gonzalez, Ex. B at 1-2.

connection with the scheme. As part of the plea agreement, Q Link and its parent and subsidiary companies are barred from participating in any program administered by the FCC.⁷

7. Under the Commission's rules, the Commission shall revoke a local service provider's ETC designation upon finding that the LSOP does not qualify as an ETC under Minn. R. 7812.0100, subp. 15. See Minn. R. 7812.1400, subp. 15.

8. Under Minn. R. 7812.0100, subp. 15, an ETC must be eligible to receive federal universal service support in accordance with United States Code, title 47, section 254, and relevant federal regulations.

9. Because Q Link is barred from participating in any program administered by the FCC, Q Link cannot fulfill its obligations as an ETC in Minnesota to offer Lifeline service to qualifying customers.

10. Q Link's continued ETC designation in light of its admitted misconduct is inconsistent with the public interest in violation of the Commission's order, Minn. R. 7812.1400, subp. 2, and 47 C.F.R. § 54.202(a), (b).⁸

REQUEST FOR RELIEF

WHEREFORE, the Department, requests that the Commission:

1. Revoke Q Link's ETC designation in Minnesota pursuant to Minn. R. 7812.1400, subp. 15.
2. Direct Q Link to notify all Minnesota customers that it is no longer providing Lifeline service and provide information on how they can find another service provider.

⁷ Decl. of Lisa Gonzalez, Ex. A at 3-4.

⁸ ORDER GRANTG PETITION WITH CONDITIONS at 2 (explaining that an ETC must demonstrate its designation is in the public interest).

3. Grant any further relief as the Commission may find appropriate.

Dated: December 10, 2024

Respectfully submitted,

Keith Ellison
State of Minnesota
Attorney General

/s/ **GREG MERZ**

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