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January 16, 2025

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: *In the Matter of the Petition of the Minnesota Department of Commerce for Revocation of the Eligible Telecommunications Carrier Status of Q Link Wireless, LLC Pursuant to Minn. R. 7812.1400, subp. 15*
MPUC Docket No. P-6883/RV-24-408

Dear Mr. Seuffert:

The Office of the Attorney General—Residential Utilities Division (OAG) respectfully submits these comments in response to the Public Utilities Commission’s Notice of Comment Period issued on December 17, 2024 regarding the Department of Commerce’s petition to revoke the eligible telecommunications carrier (ETC) status of Q Link Wireless LLC. The OAG concurs with the Department that Q Link’s ETC status should be revoked.

As the Department discussed in its petition, Q Link has held an ETC designation in Minnesota since 2013. The Commission must revoke an ETC designation if it finds that the provider does not qualify as an ETC.¹ By definition, an ETC is eligible to receive federal universal services support, including Lifeline.²

In October 2024, Q Link pled guilty to wire fraud and defrauding the Federal Communications Commission’s (FCC) Lifeline program.³ As part of the agreement, Q Link agreed not to participate in any program administered by the FCC.⁴ Q Link also agreed to cooperate with the FCC to transition all customers of any FCC administered programs to other providers.⁵

As a result of its plea agreement, Q Link no longer meets the definition of an ETC in Minnesota because it is ineligible to receive federal universal services support, including but not limited to Lifeline. Therefore, the Commission should grant the Department’s petition to revoke Q Link’s ETC designation.

¹ Minn. R. 7812.1400, subp. 15.

² Minn. R. 7812.0100, subp. 15.

³ See Gonzalez Decl., Ex. A.

⁴ See *id.*, Ex. A ¶ 8.

⁵ See *id.*, Ex. A ¶ 9.

The Commission also requested comments on whether the Commission should direct Q Link to notify all Minnesota customers that it is no longer offering Lifeline services and provide information on how they can find another provider. The Commission also asked if there is another Lifeline provider in Minnesota that could provide services to Q Link's existing customers.

The OAG believes it is important to transition Q Link's Lifeline customers to other providers and notes that cooperating with the FCC in this endeavor was included in Q Link's plea agreement.⁶ The OAG understands that many customers may have been transferred to Global Connection Inc of America d/b/a StandUp Wireless.⁷ Customers, however, can choose and change their Lifeline provider. A list of several wireless providers authorized to provide Lifeline in Minnesota and their contact information is available on the Department of Commerce's website.⁸ The Universal Service Administrative Co. also provides a lookup tool for customers to find companies in their area that offer Lifeline: <https://cnm.universalservice.org/>.

While the OAG is uncertain of the level of participation that Q Link will have in this proceeding, the OAG recommends that the Commission order Q Link to notify customers that it no longer provides Lifeline services and to send customers a list of authorized Minnesota Lifeline providers.

Thank you for your consideration of these comments. By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Katherine Hinderlie**

KATHERINE HINDERLIE

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⁶ See Gonzalez Decl., Ex. A, ¶ 9.

⁷ <https://standupwireless.com/> (perma cc: <https://perma.cc/7LB9-MVZM>).

⁸ <https://mn.gov/commerce/consumer/telecom/phone-discounts/>.

CERTIFICATE OF SERVICE

Re: *In the Matter of the Petition of the Minnesota Department of Commerce for Revocation of the Eligible Telecommunications Carrier Status of Q Link Wireless, LLC Pursuant to Minn. R. 7812.1400, subp. 15*
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I, JUDY SIGAL, hereby certify that on the 16th day of January, 2025, I e-filed with eDockets *Comments of the Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Emergency Plans	911	ecn.911-plans@state.mn.us	DPS ECN			Electronic Service		No	RV-24-408
2	MESB	911 Plan	911_dir@mn-mesb.org	DPS ECN			Electronic Service		No	RV-24-408
3	John	Auerbach	jauerbach@somos.com	NANPA/Somos, Inc.		1800 Sutter St Ste 780 Concord CA, 94502 United States	Electronic Service		No	RV-24-408
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	RV-24-408
5	David	Denton	david.denton@state.mn.us	DPS ECN		445 Minnesota Street Suite 137 St. Paul MN, 55101 United States	Electronic Service		No	RV-24-408
6	Michelle	Garber	mgarber@usac.org	USAC - Universal Service Administrative Company		2000 L St NW Ste 200 Washington DC, 20036 United States	Electronic Service		No	RV-24-408
7	Heather	Kirby	hkirby@telecomcounsel.com	Attorneys At Law		1725 Windward Concourse Ste 150 Alpharetta GA, 30005 United States	Electronic Service		No	RV-24-408
8	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	RV-24-408
9	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	RV-24-408
10	Beth	Sprague	bsprague@somos.com	NANPA/Somos, Inc.		2411 Dulles Corner Park Ste 250 Herndon VA, 20171 United States	Electronic Service		No	RV-24-408
11	Sandi	Stroud	sandi.stroud@state.mn.us	DPS ECN		445 Minnesota St, Ste 1725 Saint Paul MN, 55101 United States	Electronic Service		No	RV-24-408
12	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	RV-24-408

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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