

Robocall Mitigation Plan
Q Link Wireless, LLC

Other DBA Names:

Q Link, Hello Mobile

Q Link Wireless, LLC (“Q Link”) submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)-(iii).

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:

Q Link Wireless and Hello Mobile end users must agree to Terms of Service that prohibit abusive or unlawful calling. The Terms of Service make clear that the voice service provided to end users is intended for personal use and may not be used for telemarketing, autodialed calls, or other commercial uses. Q Link Wireless and Hello Mobile reserve the right to limit, suspend, or terminate an end user’s service for violation of the Terms of Service.

Q Link and Hello Mobile both monitor their networks for excessive usage. When Q Link or Hello Mobile receives a notification from T-Mobile about possible unlawful calls on their network, the subscriber responsible for the unlawful calls is disconnected from the network immediately.

Description of Analytics to Block Illegal Traffic:

Q Link and Hello Mobile use analytics systems in house to monitor the network for excessive usage patterns. If a customer exhibits excessive usage in violation of the terms of service, Q Link terminates the customer.

Know Your Customer Practices:

Because Q Link Wireless is a Lifeline provider, all of Q Link’s end users are enrolled or service using the National Verifier and National Lifeline Accountability Database. That enrollment process collects substantial personal information to verify the identity of Q Link end users. Q Link separately also conducts a validation of the end user’s address and identity, and checks the address against the USPS and through the Melissa Address Look-Up Service. This allows Q Link to verify that the address is a residential address. Q Link only ships phones and SIM cards to the verified address.

For Hello Mobile end users, Hello Mobile validates end user addresses through the U.S. Postal Service and the Melissa Address Look Up service. In addition, Hello Mobile confirms that the end user’s billing address matches the address provided with the end user’s credit card information. Hello Mobile also requires that end users provide their credit card CVV when signing up for service. Hello Mobile only ships phones and SIM cards to the verified address.

Know Your Upstream Provider Practices:

Q Link and Hello Mobile obtain all of their voice services, including telephone numbers, directly or indirectly (through an aggregator) from T-Mobile. T-Mobile has filed its own STIR/SHAKEN certifications. Q Link and Hello Mobile rely on T-Mobile's compliance with its STIR/SHAKEN and robocall mitigation plan obligations.

Commitment to Respond to Traceback Requests:

Q Link and Hello Mobile are willing and able to respond fully and within twenty-four hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

This Robocall Mitigation Plan describes the specific measures that Q Link and Hello Mobile have implemented as of the date of submission. Q Link and Hello Mobile continually evaluate the efficacy of their measures to combat bad actors and take appropriate steps to improve these measures when needed.