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July 14, 2020

By ECFS, IBFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **Vector Holdings Group, LLC Notice of Oral *Ex Parte*, WC Docket No. 20-140, IB File No. ITC-ASG-20200513-00069**

Dear Ms. Dortch:

On Friday, July 10, 2020, John Heitmann and Winafred Brantl of Kelley Drye & Warren LLP and Lance Steinhart of Lance J.M. Steinhart, P.C. (together, “Vector Counsel”) spoke by phone on behalf of Vector Holdings Group, LLC (“Vector”) with Jodie May and Dennis Johnson of the Wireline Competition Bureau (“WCB”), to discuss the pending Section 214 transactional applications filed by Vector, TAG Mobile, LLC and TAG Mobile Bankruptcy Sale Entity, LLC (together, the “Applicants”). Vector Counsel inquired regarding WCB Staff’s review of the applications and expressed the Applicants’ desire to facilitate progress towards approval of the proposed transaction. In particular, Vector Counsel discussed the late-filed comments recently submitted in the Bureau docket by the California Public Utilities Commission (“CPUC”).¹

In response to the CPUC’s filing, Vector Counsel explained that, although Vector and Q Link are affiliates owned by Quadrant Holdings and ultimately by Mr. Issa Asad, Vector is not Q Link. Vector Counsel, who also represent Q Link, also explained that Vector and Q Link welcomed the opportunity to respond to the CPUC’s comments before the WCB.

With respect to the specific points raised by the CPUC, Vector respectfully responds as follows:

¹ Comments of the California Public Utilities Commission, WC Dkt. No. 20-140 (Jun. 24, 2020).

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1. Vector is not Q Link. Vector is not subject to a CPUC commitment not to seek ETC authority or control over another entity, such as TAG Mobile that has ETC authority. The circumstances surrounding this transaction are unique. Mr. Asad is the best qualified bidder to rescue TAG Mobile from financial peril and continue to serve TAG Mobile's customers without interruption. The Applicants intend to make the necessary filings requesting CPUC review of the transfer of control of TAG Mobile in a timely manner.

While Q Link certainly would like to expand its brand and Lifeline offerings to Californians who qualify for Lifeline benefits, absent mutual consent between Q Link and the CPUC to the contrary, Q LINK will not seek ETC designation in California before early 2022.

2. Vector is aware of mistakes made by Q Link related to its 2012 ETC application with the CPUC. While Q Link sincerely regrets those mistakes, Vector is committed not to repeat them. To ensure complete, responsive, and accurate submissions at the CPUC relating to this transaction, Vector has retained Ms. Rachelle Chong, Law Office of Rachelle Chong, as California regulatory counsel to assist with all filings before the CPUC. Ms. Chong has served as an FCC commissioner and a CPUC commissioner. In addition to her distinguished record of public service to the country and California, Ms. Chong has a proven track record as a telecommunications expert with extensive experience in practice before the CPUC.

3. Vector is prepared to provide on a confidential basis complete financial information to the CPUC demonstrating Vector's financial capabilities and how the transaction will result in TAG Mobile being placed on a sound financial footing so that its California customers may continue to be well served.

4. The litigation referred to by the CPUC is long settled in a mutually satisfactory manner. Mr. Asad has the requisite moral character to own a company that holds an ETC license. Should the CPUC in its review find that it has concerns regarding the litigation or Mr. Asad's character more generally, Vector will be prepared to address them by demonstrating facts and refuting fiction.

Vector respectfully requests that the Commission staff advise the undersigned counsel, if it has any questions, concerns or a need for additional information.

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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cc: Jodie May
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