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April 2, 2021

**By ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Re: **Notice of Oral *Ex Parte* Presentation, WC Docket No. 20-140, IB File No. ITC-ASG-20200513-00069; (related WC Docket Nos. 17-287, 11-42, 09-197 and 10-90), WC Docket No. 20-445**

Dear Ms. Dortch:

On Wednesday, March 31, 2021, Issa Asad, CEO and Founder of Vector Holdings Group, LLC (Vector) and Q Link Wireless, LLC (Q Link); Paul Turner, President of Vector and Q Link; Rachelle Chong, Law Offices of Rachelle Chong; and the undersigned counsel met (via video conference) with Ramesh Nagarajan, Acting Legal Advisor, Wireline, to Chairwoman Jessica Rosenworcel to discuss a pending transaction which involves Vector (an affiliate of Q Link) purchasing TAG Mobile (a wireless reseller/ETC) out of bankruptcy. We explained the transaction and emphasized that we are under a May 8, 2021 bankruptcy court deadline to close the transaction which has been pending in the Wireline and International Bureaus for about 6 weeks short of a year. Because Lifeline is involved, WCB approval of a modified Lifeline Compliance Plan reflecting the new ownership is required. Because a request for domestic section 214 transfer of control was filed and a similar request for international section 214 transfer of control is required, we are awaiting WCB and IB approval of those filings.

Consistent with prior filings, we addressed comments filed last summer by the California commission and explained how approval of the section 214 transfers of control and the modified Lifeline Compliance Plan were in the public interest. In particular, we explained that although Vector is not Q Link, it would have the advantages of being a separate company that would become a revitalized competitor in the Lifeline market by drawing upon the managerial, financial and technical expertise of its parent company Quadrant Holdings and Q Link. We also noted that TAG Mobile is in bankruptcy and continuity of service to 5,000 Lifeline subscribers would be assured with approval of the transaction by the Commission and states that require prior approval of the transaction, including California and West Virginia.

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We concluded by emphasizing the need for prompt approvals to allow the transaction to close by the May 8, 2021 deadline. Consistent with prior filings, we also highlighted Q Link's plans to participate in the Emergency Broadband Benefit program.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.<sup>1</sup>

Respectfully submitted,



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*Counsel to Vector Holdings Group, LLC and  
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Attachment

cc: Ramesh Nagarajan

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<sup>1</sup> 47 C.F.R. § 1.1206(b).