

**BEFORE THE  
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Investigation by the )  
Department on Its Own Motion into the )  
Implementation in Massachusetts of the ) D.T.C. 13 - 4  
Federal Communications Commission's )  
Order Reforming The Lifeline Program )

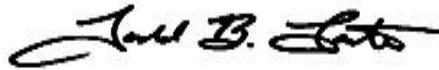
**BUDGET PREPAY, INC.  
MOTION FOR LEAVE TO INTERVENE**

Budget PrePay, Inc. d/b/a Budget Mobile ("Budget PrePay") hereby seeks leave to intervene in the above-captioned *Request for Comment and Notice of Public Hearing* ("Request for Comment") issued April 1, 2013 by the Department of Telecommunications and Cable (the "Department").

Budget PrePay, 1325 Barksdale Boulevard, Bossier City, Louisiana, is designated as an ETC for wireless services in Massachusetts,<sup>1</sup> and therefore, it is directly impacted by the outcome of this proceeding. Budget PrePay is today filing Comments in response to the *Request for Comment*.

For good cause shown, Budget PrePay respectfully request that it be granted leave to intervene in this proceeding.

Respectfully submitted,



Todd B. Lantor (MA BBO #633715)  
Robert S. Koppel

LUKAS, NACE, GUTIERREZ & SACHS, LLP  
8300 Greensboro Drive, Suite 1200  
McLean, Virginia 22102  
(703) 584-8678

*Attorneys for Budget PrePay, Inc.*

April 29, 2013

---

<sup>1</sup> Petition of Budget PrePay, Inc. for Limited Designation as a Lifeline-Only Eligible Telecommunications Carrier, *Order Approving Petition*, D.T.C. 11-12, March 5, 2013.