



COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 17-3

June 9, 2017

Petition of Budget PrePay, Inc. d/b/a Budget Mobile to Relinquish Its Lifeline-only Eligible Telecommunications Carrier Designation Pursuant to 47 U.S.C. § 214(e)(4)

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE TO BUDGET PREPAY, INC. D/B/A BUDGET MOBILE

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to Budget PrePay, Inc. d/b/a Budget Mobile (“Budget”) the following information requests:

Instructions

1. Each request should be answered in writing on a separate page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. These requests shall be deemed continuing so as to require further supplemental responses if Budget or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
3. The term “provide complete and detailed documentation” means:
 - a. Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers, including any live Excel, or similar, spreadsheets.
4. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
5. If any one of these requests is ambiguous, notify the Department so that the request may be clarified prior to the preparation of a written response.

6. The term “Petition” means Budget PrePay, Inc. d/b/a Budget Mobile’s Petition for Relinquishment of Its Lifeline-only Eligible Telecommunications Carrier Designation.
7. The term “affiliate” means any individual, partnership, association, joint stock company, trust, corporation, or other entity who (or that), directly or indirectly, owns or controls, is owned or controlled by, or is under common ownership or control with, Budget.
8. The term “ETC” means eligible telecommunications carrier.
9. The term “FCC” means Federal Communications Commission
10. File an original and three copies of the responses with Sara J. Clark, Secretary of the Department, not later than 5:00 P.M. on Wednesday July 5, 2017.

Information Requests

- D.T.C. 1-1 Identify all states in which Budget, or any of its affiliates, have received relinquishment of its ETC designation. Provide complete and detailed documentation for each such state.
- D.T.C. 1-2 Please provide the date after which Budget no longer enrolled new subscribers in Massachusetts.
- D.T.C. 1-3 The Petition included an exit plan that indicated Budget would send notice of its proposed ETC relinquishment to its subscribers via U.S. Mail and text message. Petition at 5. Confirm that these mailings and text messages were sent to each subscriber, provide the date on which each form of notice was sent, and provide a final version of the mailed written notice and text message notice.
- D.T.C. 1-4 As the service Budget provides in Massachusetts is primarily voice, how will subscribers that do not have data options on their phones be impacted by the text message notification that includes a link for additional information?
- D.T.C. 1-5 Explain Budget’s process for de-enrolling its subscribers from the National Lifeline Accountability Database (“NLAD”), including but not limited to, its de-enrollment plan, a timeline, risk mitigation, whether any subscribers will be subject to a port freeze as outlined in 47 C.F.R. § 54.411 and the FCC’s 2016 Lifeline Order (FCC 16-38), and what notice Budget has provided to the Universal Service Administrative Co. (“USAC”). Further, has Budget received confirmation a text message will be accepted by USAC and other ETCs as proof Budget ceased its services in Massachusetts for the port freeze exemption?
- D.T.C. 1-6 Please define “soft dial tone,” as the term is used in Exhibit B to the Petition. Also, state whether former subscribers placed on soft dial tone will be able to contact emergency services after the cutoff date of July 17, 2017.