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Tysons, VA 22102

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NOT ADMITTED IN VA

**LLGS** | LUKAS  
LAFURIA  
GUTIERREZ  
& SACHS LLP

July 17, 2017

**VIA E-MAIL AND OVERNIGHT MAIL**

Sara J. Clark, Secretary  
Department of Telecommunications and Cable  
1000 Washington Street, 8<sup>th</sup> Floor, Suite 820  
Boston, MA 02118-6500

**Re: D.T.C. Docket No. 17-3: Budget PrePay, Inc.'s Petition for Relinquishment of Its Eligible Telecommunications Carrier Designation in Massachusetts; Budget's Supplemental Responses to D.T.C.'s First Set of Information Requests**

Dear Ms. Clark:

Enclosed please find an original and three (3) copies of the following documents for filing in the above-referenced proceeding on behalf of Budget PrePay, Inc. ("Budget"):

1. Budget's Supplemental Responses to the Department of Telecommunications and Cable's First Set of Information Requests dated June 9, 2017;
2. The requisite Certificate of Service

Please contact me if you have any questions regarding the information provided.

Sincerely,



Todd B. Lantor  
*Counsel to Budget PrePay, Inc.*

Enclosures

cc: Courtney Hickson, Hearing Officer (w/enc. via overnight mail and e-mail)  
Sean Carroll, Deputy General Counsel (w/enc. via e-mail)  
Sandra Merrick, General Counsel (w/enc. via e-mail)  
Joe Tiernan, Administrator of Special Projects and Data Analytics (w/enc. via e-mail)  
Lindsay DeRoche, Director, Competition Division (w/enc. via e-mail)  
Joslyn Day, Director, Consumer Division (w/enc. via e-mail)  
Corey Pilz, Deputy Director, Consumer Division (w/enc. via e-mail)

**EXHIBIT A**

**COPIES OF ADDITIONAL STATE COMMISSION ORDERS  
GRANTING BUDGET PREPAY, INC.'s  
ETC RELINQUISHMENT REQUESTS**

FIRST SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

BUDGET PREPAY, INC.  
D.T.C. DOCKET NO. 17-3

**Person Responsible for Answer: Robin Enkey**  
**Date Filed: July 17, 2017**

**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.

**Supplemental Response:** Below is an updated list of states (new states in green and underlined text) in which a decision has been rendered regarding Budget's request for relinquishment of its ETC designation status. Exhibit A to these Supplemental Responses includes copies of the recent, additional decisions made by the state commissions of Hawaii, Michigan and North Dakota, as well as a revised decision rendered by the Maryland PSC canceling Budget's ETC status.

Arkansas  
Colorado  
Georgia  
Hawaii  
Idaho  
Indiana  
Iowa  
Kansas  
Kentucky  
Louisiana  
Maryland (revised decision)  
Michigan  
Nebraska  
North Dakota  
Ohio  
Oklahoma  
Puerto Rico  
Rhode Island  
South Carolina  
South Dakota  
Utah  
Washington  
West Virginia  
Wisconsin  
Wyoming

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of the Application of )  
 )  
BUDGET PREPAY, INC., dba )  
BUDGET MOBILE )  
 )  
For Relinquishment of Eligible )  
Telecommunications Carrier )  
Designation. )  
\_\_\_\_\_ )

DOCKET NO. 2017-0079

DECISION AND ORDER NO. 34675

PUBLIC UTILITIES  
COMMISSION

2017 JUN 30 A 10:02

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of the Application of )  
BUDGET PREPAY, INC., dba ) Docket No. 2017-0079  
BUDGET MOBILE )  
 ) Decision and Order No. **34675**  
For Relinquishment of Eligible )  
Telecommunications Carrier )  
Designation. )  
\_\_\_\_\_ )

DECISION AND ORDER

By this Decision and Order, the commission approves the requests of BUDGET PREPAY, INC., dba BUDGET MOBILE ("Budget"), to:  
(1) relinquish its eligible telecommunications carrier ("ETC") designation in the State of Hawaii ("State"); and (2) cancel and withdraw its Tariff No. 2.<sup>1</sup>

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<sup>1</sup>The Parties are Budget and the DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS, DIVISION OF CONSUMER ADVOCACY ("Consumer Advocate"), an ex officio party, pursuant to Hawaii Revised Statutes § 269-51 and Hawaii Administrative Rules § 6-61-62(a). No persons moved to intervene or participate in this proceeding.

I.

Background

Budget: (1) holds a certificate of registration ("COR") to provide wireless telecommunications services within the State;<sup>2</sup> and (2) is designated as an ETC throughout the State solely to provide services supported by, and to participate in the low-income programs of the federal universal service fund (i.e., a Lifeline-only ETC).<sup>3</sup>

On April 10, 2017, Budget filed its application, seeking to: (1) "relinquish its ETC designation and to discontinue Lifeline service in Hawaii because of changes in the wireless industry and proposed modifications to the Lifeline program[,] effective June 5, 2017;<sup>4</sup> and (2) cancel and withdraw its Tariff No. 2, effective June 5, 2017.<sup>5</sup>

Budget filed its application pursuant to 47 United States Code ("U.S.C.") § 214(e)(4) and 47 Code of Federal Regulations ("C.F.R.") § 54.205.

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<sup>2</sup>In re Budget Prepay, Inc., Docket No. 2012-0196, Decision and Order No. 30669, filed on October 3, 2012.

<sup>3</sup>In re Budget Prepay, Inc., dba Budget Mobile, Docket No. 2012-0327, Decision and Order No. 31371, filed on July 26, 2013.

<sup>4</sup>See Application, filed on April 10, 2017 ("Application"), at 1, 2, 3, 5, 6, and 7.

<sup>5</sup>Application, at 1, 6, and 7.

On June 19, 2017, the Consumer Advocate filed its position statement: (1) stating its non-objection to Budget's requested relief; and (2) recommending that Budget file with the commission a copy of its forthcoming correspondence with the federal United Service Administrative Company ("USAC"), which informs the USAC of this Decision and Order issued today by the commission.

On June 22, 2017, Budget filed its reply position statement, stating that it does not object to the Consumer Advocate's recommendation that Budget file with the commission a copy of its forthcoming correspondence with the USAC.

## II.

### Discussion

47 U.S.C. § 214(e)(4) states in part:

A State commission . . . shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission . . . of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission . . . shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the

relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The State commission . . . shall establish a time, not to exceed one year after the State commission . . . approves such relinquishment under this paragraph, within which such purchase or construction shall be completed.

47 U.S.C. § 214(e)(4); in accord 47 C.F.R. § 54.205(a) and (b).

The commission approves as reasonable Budget's requests to: (1) relinquish its ETC designation; and (2) cancel and withdraw its Tariff No. 2.<sup>6</sup> In support thereto, the commission specifically finds and concludes:

1. As of April 2017, Budget has 53 Lifeline customers within its ETC service area in the State.<sup>7</sup>

2. Budget's statewide ETC service area is currently served by other wireless Lifeline ETCs, such as TracFone Wireless, Inc., and Boomerang Wireless, LLC, and the incumbent

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<sup>6</sup>See In re Total Call Mobile, LLC, Docket No. 2016-0404, Decision and Order No. 34384, filed on February 8, 2017, at 6-7 (applying the reasonableness standard in approving a request to relinquish an ETC designation under 47 U.S.C. § 214(e)(4)); and In re T-Mobile West LLC, Docket No. 2014-0304, Decision and Order No. 32516, filed on December 11, 2014, at 6-7 (applying the reasonableness standard in approving a request to relinquish an ETC designation under 47 U.S.C. § 214(e)(4)).

<sup>7</sup>Budget's response to CA-IR-1(b); see also Application, at 4 (Budget provides wireless Lifeline service to customers throughout the State).

telecommunications carrier, Hawaiian Telcom, Inc.<sup>8</sup> Thus, "following the relinquishment of Budget's ETC designation, Budget's ETC service area will continue to be served by multiple ETCs."<sup>9</sup>

3. Budget's Application serves as advanced notice to the commission of Budget's intent to relinquish its ETC designation. Budget filed its Application approximately twelve weeks in advance of the commission's issuance of this Decision and Order today.

4. To the best of Budget's knowledge, "[s]ince multiple ETCs already serve the same ETC service area that Budget serves," said ETCs "will not be required to purchase or construct additional facilities to ensure that Budget's Lifeline subscribers continue to receive service."<sup>10</sup> Under these circumstances, notice to these ETCs to permit them to purchase or construct facilities to ensure that Budget's Lifeline customers will continue to receive service is unnecessary.

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<sup>8</sup>Application, at 4; see also Budget's responses to CA-IR-1 (nearly 500 of Budget's former subscribers have transferred to Boomerang Wireless, LLC) and CA-IR-7.

<sup>9</sup>Application, at 4.

<sup>10</sup>Application, at 4.

5. On April 22, 2017, Budget notified its Lifeline customers of its intent to discontinue Lifeline service.<sup>11</sup>

6. In the event the commission approves Budget's requested relief, Budget will: (A) "continue to provide its existing Lifeline customers in Hawaii with the Lifeline discount and claim reimbursement for the Lifeline discount until Budget discontinues its wireless operations in Hawaii[;]"<sup>12</sup> (B) have customer service representatives available to assist its Lifeline customers in transitioning to another Lifeline ETC;<sup>13</sup> (C) "respond to customer questions and concerns for an additional 30 days after the effective date of Budget's ETC relinquishment[;]"<sup>14</sup> and (D) not assess "any early termination fees, as Budget customers are not subject to such fees."<sup>15</sup>

Budget's commission-approved relinquishment of its ETC designation will take effect in approximately thirty calendar days from the date of this Decision and Order (see Ordering Paragraph Nos. 1 and 2, below), to provide sufficient time for a smooth and

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<sup>11</sup>Budget's response to CA-IR-3(a).

<sup>12</sup>Application, at 6.

<sup>13</sup>Application, at 6; and Budget's responses to CA-IR-3(a) and CA-IR-6(b).

<sup>14</sup>Budget's response to CA-IR-6(a).

<sup>15</sup>Application, at 5.

seamless transition of Budget's remaining Lifeline customers to another Lifeline ETC.

### III.

#### Orders

##### THE COMMISSION ORDERS:

1. Budget's request to relinquish its ETC designation in the State is approved, and will take effect on July 31, 2017.

2. Budget's request to cancel and withdraw its Tariff No. 2 is approved, and will likewise take effect on July 31, 2017.


3. Consistent with Budget's representation, Budget shall respond to customer questions and concerns for an additional thirty calendar days following the effective date of its commission-approved relinquishment of its ETC designation.

4. Consistent with the Consumer Advocate's recommendation, Budget shall file with the commission a copy of its forthcoming correspondence with the USAC, which informs the USAC of this Decision and Order issued today by the commission.

5. This docket is closed, unless ordered otherwise by the commission.

DONE at Honolulu, Hawaii JUN 30 2017


PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

By   
Randall Y. Iwase, Chair

By   
Lorraine H. Akiba, Commissioner

By   
James P. Griffin, Commissioner

APPROVED AS TO FORM:

  
Michael Azama  
Commission Counsel  
2017-0079.rs

CERTIFICATE OF SERVICE

The foregoing order was served on the date of filing by mail, postage prepaid, and properly addressed to the following parties:

DEAN NISHINA  
EXECUTIVE DIRECTOR  
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS  
DIVISION OF CONSUMER ADVOCACY  
P.O. Box 541  
Honolulu, HI 96809

CARLITO P. CALIBOSO, ESQ.  
JODI S. YAMAMOTO, ESQ.  
DAVID A. MORRIS, ESQ.  
YAMAMOTO CALIBOSO  
1100 Alakea Street, Suite 3100  
Honolulu, HI 96813

Counsel for BUDGET PREPAY, INC., dba BUDGET MOBILE

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

\*\*\*\*\*

In the matter of the application of	)	
<b>BUDGET PREPAY, INC., d/b/a BUDGET PHONE,</b>	)	
for designation as an eligible telecommunications	)	Case No. U-16803
carrier pursuant to Section 214(e)(2) of the	)	
Communications Act of 1934, as amended.	)	
_____	)	

At the July 12, 2017 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. Sally A. Talberg, Chairman  
Hon. Norman J. Saari, Commissioner  
Hon. Rachael A. Eubanks, Commissioner

**ORDER**

On May 25, 2011, Budget PrePay, Inc., d/b/a Budget Phone (Budget PrePay) filed an application for designation as a wireless eligible telecommunications carrier (ETC) for purposes of receiving Lifeline universal service fund support. In the June 26, 2012 order in this docket, the Commission approved the application. Budget PrePay is a wireless ETC that receives universal service fund support for Lifeline only in the state of Michigan.

On May 10, 2017, Budget PrePay filed an application requesting to relinquish its wireless ETC status effective July 5, 2017. On October 27, 2016, Budget PrePay filed a customer transfer completion notice, informing the Commission that it had transferred a number of its wireless Lifeline customers to Boomerang Wireless, LLC, d/b/a enTouch Wireless. In the application,

Budget PrePay states that it currently has fewer than 3,000 wireless Lifeline subscribers in Michigan.

47 USC 214(e)(4) provides as follows:

A State commission...shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier...Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission...shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The State commission...shall establish a time, not to exceed one year after [approval of] such relinquishment under this paragraph, within which such purchase or construction shall be completed.

*See also*, 47 CFR 54.205. Thus, relinquishment shall be granted to a carrier for any area that is served by more than one ETC. The Universal Service Administrative Company has assigned study area code 319034 to Budget PrePay to represent its ETC service area in Michigan.

Attachment A to Budget PrePay's application for relinquishment includes a list of 12 other wireless ETC providers who provide service in Budget PrePay's service area. In addition, Attachment B to the application contains a list of non-rural wire centers (AT&T Michigan, Frontier North Inc., and Frontier Midstates, Inc.) providing landline Lifeline service in Budget PrePay's service area. MCL 484.2316. Based upon the number of additional wireless ETCs providing service throughout Budget PrePay's service area, as well as landline Lifeline providers, the Commission is confident that all customers served by the relinquishing ETC will continue to receive service. The Commission believes that it is unlikely that the purchase or construction of additional facilities will be required to serve any of Budget PrePay's Lifeline customers; however, in accordance with 47 USC 214(e)(4), the Commission sets July 12, 2018, as the deadline for completion of any such purchase or construction.

According to the May 10, 2017 application, within one business day of approval of the application Budget PrePay will notify all current customers in Michigan via text message of Budget PrePay's intent to discontinue service. The Commission establishes a discontinuance date of August 31, 2017. Budget PrePay has included a sample of the text notice in the application. Budget PrePay also states that it will provide written notification by U.S. Mail to all remaining Budget PrePay Lifeline customers in Michigan, and a sample letter is included with the application. The Commission Staff (Staff) has reviewed the text notification and letter, and finds that they adequately inform customers of the pending change (however, the discontinuance date will be modified). The notices inform customers that they will need to contact another Lifeline provider if they wish to continue service, and provide a link to a list of other wireless ETC providers in Michigan. Customers are also provided with a customer assistance number to call for any questions or assistance. The Staff supports Budget PrePay's application to relinquish its wireless ETC designation.

The Commission accepts the relinquishment application of the wireless ETC designation of Budget PrePay effective August 31, 2017. The Commission requires Budget PrePay to provide text message as well as written notices to current Lifeline customers of the final date of service. The notices shall be filed in this docket, along with a notice informing the Commission that the service has officially been discontinued.

THEREFORE, IT IS ORDERED that:

A. The eligible telecommunications carrier designation of Budget Prepay, Inc., d/b/a Budget Phone, is relinquished effective August 31, 2017.

B. Budget Prepay, Inc., d/b/a Budget Phone, shall provide a text message notice to its Michigan Lifeline customers within one business day of the Commission's approval of this order

to inform those customers of the official date of discontinuance. A copy of the text message notice shall be filed in this docket within five business days of it being sent to customers.

C. Budget Prepay, Inc., d/b/a Budget Phone, shall also provide a second notice (written letter) via U.S. Mail to all of its Michigan Lifeline customers no later than 3 weeks before discontinuance of service. A copy of the written notice shall be filed in this docket within five business days of it being sent.

D. Budget Prepay, Inc., d/b/a Budget Phone, shall provide notice in this docket once service has officially been discontinued.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party aggrieved by this order may file an action in the appropriate federal District Court pursuant to 28 USC 1331. To comply with the Michigan Rules of Court's requirement to notify the Commission of an appeal, appellants shall send required notices to both the Commission's Executive Secretary and to the Commission's Legal Counsel. Electronic notifications should be sent to the Executive Secretary at [mpscdockets@michigan.gov](mailto:mpscdockets@michigan.gov) and to the Michigan Department of the Attorney General - Public Service Division at [pungpl@michigan.gov](mailto:pungpl@michigan.gov). In lieu of electronic submissions, paper copies of such notifications may be sent to the Executive Secretary and the Attorney General - Public Service Division at 7109 W. Saginaw Hwy., Lansing, MI 48917.

MICHIGAN PUBLIC SERVICE COMMISSION



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Sally A. Talberg, Chairman



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Norman J. Saari, Commissioner



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Rachael A. Eubanks, Commissioner

By its action of July 12, 2017.



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Kavita Kale, Executive Secretary

# PROOF OF SERVICE

STATE OF MICHIGAN )

Case No. U-16803

County of Ingham )

Angela McGuire being duly sworn, deposes and says that on July 12, 2017 A.D. she electronically notified the attached list of this **Commission Order via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).



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Angela McGuire

Subscribed and sworn to before me  
this 12th day of July 2017



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Lisa Felice  
Notary Public, Eaton County  
My Commission Expires April 15, 2020

Service List for Case Number U-16803

Name	Email Address
Michael Ashton	mashton@fraserlawfirm.com
Budget PrePay Inc	lakishat@budgetprepay.com,

**STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION**

**Budget PrePay, Inc.  
Designated Eligible Carrier  
Cancellation / Application**

**Case No. PU-17-175**

**ORDER ON ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

**July 12, 2017**

**Preliminary Statement**

On December 12, 2012, the Commission issued an Order designating Budget PrePay, Inc. (Budget) as an eligible telecommunications carrier (ETC) for the purpose of receiving federal universal service support for low-income consumers in the study areas of Qwest Corporation and SRT Communications, Inc. in North Dakota, Case No. PU-12-707.

On April 26, 2017, the Commission received Budget's application to relinquish the ETC designation and to discontinue the provision of wireless services due to changes in the wireless industry and proposed modifications to the Federal Communications Commission's Lifeline program.

On May 10, 2017, the Commission issued a Notice of Opportunity for Comment providing until close of business on June 23, 2017 to receive comments. No comments were received.

**Discussion**

Budget intends to relinquish its designation as an ETC due to changes in the wireless industry and proposed modifications to the Federal Communications Commission's Lifeline program.

Under 47 U.S.C. section 214(e)(4) and 47 C.F.R. section 54.205, the Commission shall permit a carrier to relinquish its ETC designation for an area served by more than one eligible telecommunications carrier. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the state commission shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The state commission shall establish a time, not to exceed one year after the state commission approves such relinquishment under this section, within which such purchase or construction shall be completed.

The Commission has reviewed the documents in this proceeding and finds that it has not been shown that customers served by the relinquishing carrier will not continue to be served by the remaining eligible telecommunications carrier or carriers. Budget states that it has less than 40 subscribers in North Dakota.

**Order**

The Commission orders that Budget PrePay, Inc.'s relinquishment of its December 12, 2012 designation as an essential telecommunications carrier is permitted effective July 12, 2017.

**PUBLIC SERVICE COMMISSION**

  
\_\_\_\_\_  
**Brian Kroshus**  
**Commissioner**

  
\_\_\_\_\_  
**Randy Christmann**  
**Chairman**

  
\_\_\_\_\_  
**Julie Fedorchak**  
**Commissioner**

STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION

Budget PrePay, Inc.  
Designated Eligible Carrier  
Cancellation / Application

Case No. PU-17-175

AFFIDAVIT OF SERVICE BY CERTIFIED MAIL

STATE OF NORTH DAKOTA  
COUNTY OF BURLEIGH

**Geralyn R. Schmaltz** deposes and says that:

she is over the age of 18 years and not a party to this action and, on the **14th day of July, 2017**, she deposited in the United States Mail, at Bismarck, North Dakota, **one** envelope with certified postage, return receipt requested, fully prepaid, securely sealed and containing a photocopy of:

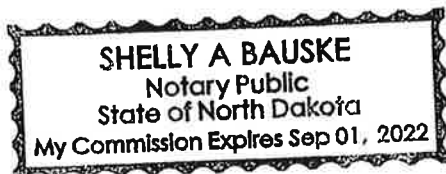
- **Order on Eligible Telecommunications Carrier Designation**

The envelope was addressed as follows:

Todd B. Lantor  
Counsel to Budget PrePay, Inc.  
Lukas, LaFuria, Gutierrez & Sachs, LLP  
8300 Greensboro Drive, Suite 1200  
Tysons, Virginia 22102  
**Cert. No. 7015 0640 0006 6993 9249**

Each address shown is the respective addressee's last reasonably ascertainable post office address.

Subscribed and sworn to before me  
this **14th day of July, 2017**.



Notary Public

SEAL

COMMISSIONERS

STATE OF MARYLAND

W. KEVIN HUGHES  
CHAIRMAN

HAROLD D. WILLIAMS  
MICHAEL T. RICHARD  
ANTHONY J. O'DONNELL



CORRECTED

PUBLIC SERVICE COMMISSION

#2, 5/31/17 AM; ML# 214903, TE-11896

May 31, 2017

Todd B. Lantor  
Todd R. Slamowitz  
Lukas, LaFuria, Gutierrez & Sachs, LLP  
8300 Greensboro Drive, Suite 1200  
Tysons, VA 22102

Dear Messrs. Lantor and Slamowitz:

The Commission has reviewed the request filed on April 28, 2017 by Budget PrePay, Inc. d/b/a Budget Mobile for the relinquishment of its designation as an Eligible Telecommunications Carrier providing Lifeline service in Maryland.

After considering this matter at the May 31, 2017 Administrative Meeting, the Commission **canceled** the Company's designation as an Eligible Telecommunications Carrier, effective June 5, 2017, and directed the Company to inform the Commission once its remaining customers have migrated to other carriers.

By Direction of the Commission,

A handwritten signature in blue ink, appearing to read "David J. Collins".

David J. Collins  
Executive Secretary

DJC/st

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

\_\_\_\_\_  
In the Matter of )  
 )  
BUDGET PREPAY, INC. )  
 )  
Petition for Relinquishment of Its Eligible )  
Telecommunications Carrier Designation )  
In Massachusetts )  
\_\_\_\_\_

D.T.C. Docket No. 17-3

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing Supplemental Responses of Budget PrePay, Inc. to the D.T.C.'s First Set of Information Requests on all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) of the Department's Procedural Rules.



Todd B. Lantor  
LUKAS, LAFURIA, GUTIERREZ & SACHS, LLP  
8300 Greensboro Drive, Suite 1200  
Tysons, VA 22102  
Phone: (703) 584-8671  
E-mail: tlantor@fcclaw.com

*Counsel to Budget PrePay, Inc.*

Dated: July 17, 2017