

**Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**In the Matter of Budget PrePay, Inc.
Petition for Limited Designation as an
Eligible Telecommunications Carrier**

Docket No. 11-12

MOTION FOR EXTENSION OF TIME

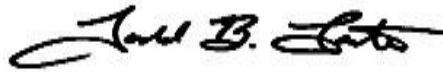
Pursuant to 220 C.M.R. 1.02(5), Budget PrePay, Inc. d/b/a Budget Mobile (“Budget” or the “Company”) hereby files with the Massachusetts Department of Telecommunications and Cable (the “Department”) this Motion for Extension of Time. This Motion seeks a one week extension of time, from October 17, 2012 until October 24, 2012, to file responses to certain Record Requests made during the September 25, 2012 hearing regarding Budget PrePay’s pending ETC application.

Budget will file responses to several of the Record Requests by the initial October 17, 2012 deadline. However, Budget seeks a one week extension of time to file certain Record Request responses. Most of these Record Requests for which Budget requires a one week extension of time seek detailed financial information about the Company. Due to travel schedules, the persons responsible for developing such financial information have been out of the office and unable to complete the responses to these Record Requests. In addition, the responses to certain other Record Requests for which Budget seeks a one week extension of time require the cooperation of Budget’s underlying service providers. Budget has not yet been able to obtain from its partners all of the information necessary to provide complete responses.

For the reasons set forth herein, the Company submits that good cause has been shown for grant of this Motion for Extension of Time, and the Company respectfully requests that the

Department grant this Motion to provide a one week extension of time – until October 24, 2012 – to file responses to the Record Requests – though Budget PrePay will file certain Record Request responses with the Department by the October 17, 2012 deadline.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Todd B. Lantor". The signature is fluid and cursive, with the first name "Todd" being the most prominent.

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

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

Counsel for Budget PrePay, Inc.

October 16, 2012