

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of \_\_\_\_\_ )  
Budget Prepay, Inc. for Designation as a \_\_\_\_\_ ) Case No. CO-2012-0043  
Wireless Eligible Telecommunications Carrier)

**RESPONSE OF BUDGET PREPAY, INC. TO STAFF RECOMMENDATION**

COMES NOW Budget Prepay, Inc. (“Budget” or “Company”), and responds to Staff’s Recommendation that the Commission deny Budget’s Application to the Commission for designation as a wireless Eligible Telecommunications Carrier (“ETC”) in areas served by Southwestern Bell Telephone Company, L.P. d/b/a AT&T Missouri for which Budget has already been granted ETC status, and solely for the purpose of receiving federal Universal Service Fund low-income support for Lifeline and Link-Up services. In support of its Response, Budget states the following:

1. On August 8, 2011, Budget filed its Application for designation as a wireless ETC in this docket. Budget was originally granted wireline ETC status in Case No. TA-2010-0146.

2. In July of this year, Staff issued data requests to all companies participating in the low income program for the purpose of conducting a general Lifeline audit. Staff asserts that a number of the Company’s responses to those data requests were deficient, and Staff did notify the Company of those deficiencies. The Company continues to work to resolve the issues raised by Staff and requests that the Commission grant it additional time to adequately respond to Staff.

3. On September 16, 2011, Staff issued data requests to Budget in its capacity as a pending ETC applicant in this docket. The Company timely responded to those data

requests in full on October 6, 2011.

4. The Company expects to quickly resolve the issues raised by Staff regarding its responses to Staff's data requests on its current participation in the low income program.

WHEREFORE, Budget respectfully requests that the Commission postpone action on Budget Prepay Inc.'s Application to the Commission for Designation as a Wireless Eligible Telecommunications Carrier until the Company can quickly resolve issues raised by Staff regarding its current participation in the low income program.

Respectfully submitted,

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ATTORNEYS FOR BUDGET PREPAY,  
INC.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this the 21st day of October, 2011, served a true copy of the foregoing pleading upon the following parties in accordance with Commission Rules:

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/s/Lisa A. Gilbreath  
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