



October 30, 2013

Via Efile

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Ms. Susana Woolcock
Telecommunications Division
Michigan Public Service Commission
4300 W. Saginaw Highway
Lansing, MI 48911

In the matter, on the Commission's)
Own Motion, on the Certification of)
Eligible Telecommunications Carriers)

Case No. U-17182

Dear Ms. Woolcock:

Budget PrePay is in receipt of your letter dated October 17, 2013, regarding its state copy filing of the FCC 481 and ETC recertification. The attached information provides responses to each of the items listed in your letter.

Questions regarding this filing should be directed to my attention at 407-740-8575. Thank you for your assistance in this matter.

Sincerely,

Craig Neeld
Compliance Reporting Specialist

cc: Lakisha Taylor - Budget PrePay, Inc. d/b/a Budget Mobile
file: Budget PrePay, Inc. d/b/a Budget Mobile - Reporting - Michigan

Budget PrePay, Inc.'s Eligible Telecommunications Carrier Recertification in Michigan, U-17182

Budget PrePay, Inc d/b/a Budget Phone SAC: 319034

The following information is provided in response to the MI PSC's letter dated October 17, 2013, regarding Budget's FCC Form 481 Michigan state copy:

FCC Form 481 Lines 200, 210

No Outages in 2012

FCC Form 481 Lines 400, 410, 420

No complaints in 2012

FCC Form 481 Lines 500, 510

Please see attached (1)

FCC Form 481 Line 600

Please see attached (2)

FCC Form 481 Line 800

A corrected company name has been filed with USAC. Please see the revised Section 800 attached. (3)

Attachment 1
Compliance with Service Quality Standards and Consumer Protection

Budget PrePay, Inc.
Compliance with Service Quality Standards and
Consumer Protection

Budget PrePay, Inc. (“Budget”) hereby certifies that it complies with applicable service quality and consumer protection practices in connection with its provision of wireless voice service. Among other things, Budget:

- Complies with the service standards promulgated by the State of Michigan.
- Discloses rates and terms of its voice services to customers.
- Provides contract terms to customers and confirms changes in voice service.
- Separately identifies carrier charges from taxes on billing statements.
- Provides ready access to customer service.
- Promptly responds to consumer inquiries and complaints received from government agencies.
- Abides by CPNI rules and other rules for the protection of consumer privacy.

Additional items that can be added if accurate:

- Makes available maps showing the local calling area.
- Allows a trial period for new voice service.
- Provides specific disclosures in advertising.
- Provides customers the right to terminate voice service for changes to contract terms.

Attachment 2
Budget PrePay, Inc. Emergency Backup Procedures

BUDGET PREPAY INC. EMERGENCY BACKUP PROCEDURES

Budget PrePay Inc. has geographically located its switching infrastructure. This network design is in an effort to eliminate a single isolated power incident from affecting traffic on Budget PrePay's network. All facilities are equipped with both AC and DC battery backup as well as generators. All critical equipment is also supplied with 2 separate power sources (or primary and redundant power feeds).

Budget PrePay maintains multiple paths to reach our network. This is setup by using multiple IP transit providers for all IP connectivity and an N+1 configuration on all TDM connectivity. Once the origination traffic reaches the Budget PrePay network all elements are setup with the same N+1 configuration. The configuration allows each element a primary and redundant path to terminate the traffic without service interruption. In the event the main element fails or that element reaches maximum capacity Budget has designed the network to advance the traffic to 1 of 3 other elements in the same N+1 configuration that is listed above.

Budget PrePay has built the voice network to be self-sustaining in the event of a failure. The switching infrastructure will advance to the next termination carrier in route in the event of a failure on any termination carrier's route. Budget PrePay maintains a Least Cost Routing engine (LCR) that has over 20 carriers available to every call.

Budget has redundant, geographically separated call centers with the capability to route incoming calls as needed, and additional data processing capacity at each of its three datacenters that can accommodate extra workload as needed in the event of a systems outage. With daily GFS backups, monthly offsite tape backup, and a tertiary optical backup of critical SQL databases, data can be quickly restored in the event of a key systems failure. Budget maintains 24x7x365 support agreements on all key systems, with 4hr maximum response time specified where possible, so that technical support is always available.

In the event of a service impacting event, an initial investigation and impact analysis should determine whether the affected services can be restored within the timeframe of the MTO (Maximum Tolerable Outage). If it is uncertain that services can be restored within the MTO, a disaster is declared and a detailed incident investigation ensues. Based upon the results Budget will either correct the affected service(s) or invoke disaster recovery activities, such as routing all calls to the alternate call center and rerouting data and/or telecomm traffic to servers and equipment in the unaffected datacenters while the affected service is restored.

Additional Michigan specific information:

Explain Budget's procedures in the event that 911 dispatch officer is in need of further customer proprietary network information (CPNI) in order to reach the distressed 911 caller.

In the event a 911 dispatch officer is in need of further customer proprietary network information (CPNI), a Budget representative shall request the 911 officer to first disclose their name, location, and Badge #. Once the Budget representative has confirmed that the caller does in fact work for the 911 dispatch office in that location, the representative provides the information requested.

What process does Budget have in place when a 911 call is identified by the 911 dispatch center as a call provided by the underlying carrier and not Budget?

Budget follows the same process detailed above.

In the event the 911 dispatch center requires the end user's CPNI, how is the information that Budget is the end user's actual service provider conveyed to public safety answering point personnel for emergency contact purposes?

Budget informs the 911 dispatch center that we are the service provider for the CPNI and that we rely on our underlying carriers coverage area. However, Budget is the administrator of the service to the end user.

Please provide detailed information including any communications regarding this issue with the underlying carrier.

There is none to provide at this time.

Attachment 3
Revised Section 800

