

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM-1684

INVESTIGATION INTO THE OREGON)	MOTION OF BUDGET PREPAY,
TELEPHONE ASSISTANCE PROGRAM)	INC. FOR EXTENSION OF TIME
AND LIFELINE MARKETING)	TO COMMENT AND REQUEST
PRACTICES)	FOR EXPEDITED
)	CONSIDERATION

Budget PrePay, Inc. (“Budget PrePay”) respectfully moves for a two-week extension of time to file comments on the Staff’s report and recommendations filed on August 7, 2014. Comments are currently due August 12, 2014. Based on informal inquiry and responses to date by email, no party opposes an extension and several parties support an extension. The Staff is not opposed to an extension of just one week.

The Staff’s report and recommendations in this docket were originally scheduled to be filed on May 27, 2014. Pursuant to Staff requests and agreement of the parties, the due date for the Staff report has been changed twice, ultimately to August 5, 2014. Each of the schedules have called for the Staff’s report within 10 business days and the parties’ comments within five business days (generally one week) of the Staff’s filing.

When the parties agreed to a week to respond to comment on Staff’s ultimate filing, Budget PrePay did not anticipate the nature and scope of the report. The Staff has provided extensive background information, along with conceptual rule proposals that differ from ones previously proposed. Staff’s Status Report and Recommendations is over 100 pages. Staff’s voluminous submission requires the parties to take time to carefully review and prepare a written response. Thus, the Staff’s submission require the parties to take time to carefully review and prepare a written response.

The outcome of this proceeding is important for Oregon consumers and the interested

parties. Five days is not sufficient for a comprehensive response, given the volume of material provided, the complexity and importance of the issues being considered, and the potential impact on the low-income population in Oregon.

A two-week extension is in the public interest and consistent with the extensions previously sought by Staff in other instances and will not prejudice the proceeding in any way. Instead, it will ensure a more thorough record for the ALJ's consideration.

CONCLUSION

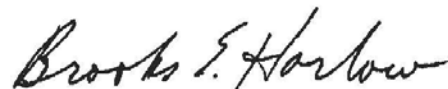
Since comments are due tomorrow and no party objects to a week's delay, Budget PrePay requests an immediate one-week extension—to August 19, 2014—of the comment deadline, followed by an additional one-week extension—to August 26, 2014—after other parties have had an opportunity to state their positions on the full length of the extension.

Respectfully submitted this 11th day of August, 2014.

Budget PrePay, Inc.

By Counsel:

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



By: Brooks E. Harlow (OSB # 030420)

August 11, 2014

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of August 2014, a true and correct copy of the foregoing **MOTION FOR EXTENSION OF TIME** of Budget PrePay, Inc., was served, via electronic mail, to the following:

G. Catriona McCracken
Citizen's Utility Board of Oregon
610 SW Broadway, Ste 400
Portland OR 97205
catriona@oregoncub.org

Jon Cray
Citizen's Utility Board of Oregon
610 SW Broadway, Ste 400
Portland OR 97205
jon.cray@state.or.us

Kay Marinos
Citizen's Utility Board of Oregon
610 SW Broadway, Ste 400
Portland OR 97205
kay.marinos@state.or.us

Johanna Riemenschneider
PUC Staff - Department Of Justice
Business Activities Section
1162 Court St NE
Salem OR 97301-4796
johanna.riemenschneider@doj.state.or.us

Robert Jenks
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97205
bob@oregoncub.org

David Collier
AT&T Services, Inc.
645 E Plumb LNM RN C-142
PO Box 11010
Reno NV 89502
David.collier@att.com

Cynthia Manheim
AT&T
PO Box 97061
Redmond WA 98052
Cm9268@att.com

Sharon L. Mullin
AT&T Services, Inc.
2003 Point Bluff
Austin TX 78746-6236
slmullin@att.com

Alan Galloway
Davis Wright Tremaine
Suite 2400
1300 SW Fifth Avenue
Portland, Oregon 97201-5610
alangalloway@dwt.com

Mark Trincherro
Davis Wright Tremaine
Suite 2400
1300 SW Fifth Avenue
Portland, Oregon 97201-5610
Marktrincherro@dwt.com

Teri Ohta
12920 SE 38th Street
Bellevue WA 98006
Teri.ohta@t-mobile.com

Sommer Templet
Citizen's Utility Board of Oregon
610 SW Broadway, Ste 400
Portland OR 97205
sommer@oregoncub.org

Michel Lee
michellee@comspancomm.com

David Poston
david.poston@state.or.us



Elisheva Simon