## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

## UM 1648

In the Matter of

PUBLIC UTILITY COMMISSION OF OREGON,

PETITION TO INTERVENE

Staff Investigation into Eligible Communication Carriers' Requirements.

Budget PrePay, Inc. petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name:	Robin Enkey
Company:	Budget PrePay, Inc.
Street Address:	1325 Barksdale Blvd.
City, State, Zip:	Bossier City, LA 71111
Email Address:	robine@budgetprepay.com
Telephone:	318-671-5784

Please include this contact on the service list.

2a. The petitioner  $\boxtimes$  will  $\square$  will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name:	Brooks E. Harlow, OSB No. 030420
Company:	Lukas, Nace, Gutierrez & Sachs, LLP
Street Address:	8300 Greensboro Drive, Suite 1200
City, State, Zip:	McLean, VA 22102
Email Address:	bharlow@fcclaw.com
Telephone:	703-584-8680

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name:	Todd B. Lantor
Company:	Lukas, Nace, Gutierrez & Sachs, LLP
Street Address:	8300 Greensboro Drive, Suite 1200
City, State, Zip:	McLean, VA 22102
Email Address:	tlantor@fcclaw.com
Telephone:	703-584-8671

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

Budget PrePay, Inc. has a petition pending for designation as an eligible telecommunications carrier for purposes of receiving low income support from the Federal Universal Service fund and the Oregon Telephone Assistance Program.

5. The issues the Petitioner intends to raise at the proceeding are:

To be determined as the docket progresses.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Budget PrePay, Inc. and its counsel have years of experience with universal service matters at the federal and state levels.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

Brooks E. Horlow

Brooks E. Harlow Counsel to Budget PrePay, Inc.

<u>3/15/2013</u> Date Signed

## CERTIFICATE OF SERVICE UM 1648

I certify that I sent the attached Petition to Intervene of Budget PrePay, Inc. by electronic mail and Federal Express to the following:

FILING CENTER PUBLIC UTILITY COMMISSION OF OREGON 550 CAPITOL STREET NE #215 SALEM, OR 97308-2148 puc.filingcenter@state.or.us

I hereby certify that I served the attached Petition to Intervene of Budget PrePay, Inc. upon all parties of record in this proceeding by electronic mail, pursuant to OAR 860-013-0070, to the following parties or attorneys of parties:

By:

Kay Marinos Public Utility Commission of Oregon PO Box 2148 Salem, OR 97308-2148 kay.marinos@state.or.us

Richard A. Finnigan Law Office of Richard A. Finnigan 2112 Black Lake Blvd SW Olympia, WA 98512 rickfinn@localaccess.com

Brant Wolf Oregon Telecommunications Association 777 13<sup>th</sup> Street SE, Suite 120 Salem, OR 97301-4038

Dated at McLean, VA this 15<sup>th</sup> day of March, 2013.

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Joséph Mirshak Legal Assistant Lukas, Nace, Gutierrez & Sachs, LLP