

LUKAS, NACE, GUTIERREZ & SACHS, LLP

8300 GREENSBORO DRIVE, SUITE 1200
MCLEAN, VIRGINIA 22102
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ*
ELIZABETH R. SACHS*
DAVID A. LAFURIA
PAMELA L. GIST
TODD SLAMOWITZ*
BROOKS E. HARLOW*
TODD B. LANTOR*
STEVEN M. CHERNOFF*
KATHERINE PATSAS NEVITT*

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEILA REZANAVAZ
—
OF COUNSEL
GEORGE L. LYON, JR.
LEONARD S. KOLSKY*
JOHN CIMKO*
J. K. HAGE III*
JOHN J. MCAVOY*
HON. GERALD S. MCGOWAN*
TAMARA DAVIS BROWN*
JEFFREY A. MITCHELL*
ROBERT S. KOPPEL*
MARC A. PAUL*
—
*NOT ADMITTED IN VA

June 18, 2012

FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: WC Docket No. 09-197; WC Docket No. 11-42

Madam Secretary:

Budget PrePay, Inc. (“Budget PrePay” or “Company”) respectfully submits this supplement to its Petitions for Limited Designation as an Eligible Telecommunications Carrier (“ETC”) (“Petitions”) for ten states.¹

Budget PrePay hereby supplements its Petition as follows:

Ability to Remain Functional in Emergency Situations -- Section 54.202(a)(2)²

Budget PrePay has the ability to remain functional in emergency situations. The Company has geographically located its switching infrastructure in two locations. 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

¹ ETC Petitions were filed with the Commission by Budget PrePay, Inc. on April 8, 2011 for the following states: Alabama, Connecticut, Delaware, District of Columbia, New Hampshire, New York, North Carolina, Tennessee, and Virginia. Public Notice, DA 11-815, May 2, 2011. An additional ETC Petition was filed with the Commission by Budget PrePay, Inc. for Florida on August 1, 2011. Public Notice, DA 11-1583, September 20, 2011.

² In order to be designated an eligible telecommunications carrier under section 214(e)(6), any common carrier in its application must: ... (2) Demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. 47 C.F.R. § 54.202(a)(2).

well as generators. All critical equipment is also supplied with two separate power sources (or primary and redundant power feeds).

Budget PrePay maintains multiple paths to reach its network. This is accomplished by using multiple IP transit providers for all IP connectivity and an N+1 configuration for all TDM connectivity. Once the origination traffic reaches the Budget PrePay network all elements are set up 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 PrePay 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 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 data centers 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 PrePay maintains 24x7x365 support agreements on all key systems, with four hour 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 PrePay 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 voice traffic to servers and equipment in the unaffected data centers while the affected service is restored.

Budget PrePay's underlying wireless providers, Sprint and Verizon Wireless, have indicated that they implement best practices in business continuity and have very robust emergency response and disaster recovery capabilities which enable quick restoration of impacted services following a disaster and mitigate congestion risks through traffic management algorithms to handle the overload surges in traffic. In addition, both Sprint and Verizon Wireless are ETCs and have certified to the FCC that they are both able to function in emergency situations in accordance with 47 C.F.R. 54.202(a)(2).³

³ See e.g., Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209, CC Docket No. 96-45, at 6 (filed Oct. 1, 2010); see also Alltel Communications, LLC d/b/a Verizon Wireless 2010 Eligible Telecommunications Carrier Certification and Annual Report for the State of Georgia, pursuant

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If you have any questions or require any additional information, please contact undersigned counsel directly.

Respectfully submitted,



Todd B. Lantor

Robert S. Koppel

Lukas, Nace, Gutierrez & Sachs LLP

8300 Greensboro Drive

Suite 1200

McLean, VA 221021

Phone: (703) 584-8678

Counsel to Budget PrePay, Inc.

cc (via e-mail): Best Copy and Printing, Inc.

Kim Scardino

Divya Shenoy

Charles Tyler