

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAY 10 2011

PUBLIC SERVICE
COMMISSION

In the Matter of:

Petition of Budget PrePay, Inc. d/b/a Budget
Phone for Designation as a Non-Rural Wireless
Eligible Telecommunications Carrier

2011-00169

**APPLICATION OF BUDGET PREPAY, INC. FOR DESIGNATION
AS A NON-RURAL WIRELESS ELIGIBLE TELECOMMUNICATIONS CARRIER**

Budget PrePay, Inc. (“Budget” or the “Company”), which is, *inter alia*, a commercial radio service (“CMRS”) provider, hereby requests from the Public Service Commission of Kentucky (“Commission”) designation as a wireless Eligible Telecommunications Carrier (“ETC”) in areas served by three non-rural Kentucky ILECs — BellSouth Telecommunications, Inc. d/b/a/ AT&T Southeast (“AT&T”), Cincinnati Bell Telephone Company (“Cincinnati Bell”), and Windstream Kentucky East, LLC (“Windstream”) — for the purpose of receiving Federal Universal Service Fund (“FUSF”) and Kentucky Universal Service Fund (“KUSF”) low-income support for Lifeline and Link Up services.

I. INTRODUCTION

A. Background

Budget is a Louisiana corporation¹ and is authorized to conduct business as a foreign corporation in the State of Kentucky.² Budget, the corporate successor to Budget Phone, Inc.,³ is

¹ Budget Phone was incorporated in the State of Louisiana on May 1, 1996 (Charter/Organization ID 34525907D). The principal office of the Company is located at 1325 Barksdale Blvd, Bossier City, LA 71111.

² Kentucky Secretary of State’s Office lists an authorization date of March 12, 1999 (Organization Number 0470906). Budget’s Articles of Incorporation and the 2005 amendment thereto have already been filed with the Commission, as Exhibit 2 to the Application initiating Ky. PSC Case No. 2009-00269, *Application of Budget PrePay, Inc. for Designation as a Non-Rural Eligible Telecommunications Carrier pursuant to §214(e)(2) of the Communications Act of 1934.*

a Competitive Local Exchange Carrier (“CLEC”) and is authorized by the Commission to provide basic local exchange services and long distance service within Kentucky.⁴ It has also registered as a wireless telecommunications utility in Kentucky.⁵ Budget (or its corporate predecessor) has been providing telecommunications services in Kentucky since May 28, 2000. Budget provides service over a combination of its own facilities, including leased transport lines and leased loops, and resale lines.

On December 28, 2009, the Commission issued an Order in Case No. 2009-00269, granting Budget designation as a wireline ETC in the entire service areas of AT&T and Windstream and finding it eligible to receive FUSF low-income support for its wireline Lifeline and Link Up services. Budget is now seeking authority to include wireless as part of its low-income service offerings beginning in the 3rd quarter of 2011.

B. Contact and Service List Information

Budget’s contact name for this Application and postal address are set forth below:

R. Danny Hyde, III
Budget PrePay, Inc.
1325 Barksdale Blvd
Bossier City, LA 71111

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be directed to Budget’s counsel as set forth below:

Katherine K. Yunker
YUNKER & PARK PLC
P. O. Box 21784

³ On February 1, 2006 Budget acquired and succeeded to the public service business of Budget Phone, Inc. See P.S.C. Ky. Adoption Notice No. 1, issued February 1, 2006.

⁴ Budget’s CLEC (class A) utility identification number is 5050350; its long distance carrier (class B) utility identification number is 5153200. Budget’s tariff for the provision of basic local exchange service on file with the Commission is Kentucky PSC Tariff No. 1 (rec’d 4/3/2007).

⁵ Budget’s cellular (class C) utility identification number is 410560; for wireless service, it does business as “Budget Mobile.”

Lexington, KY 40522-1784
(859) 255-0629
fax: 859-255-0746

II. BUDGET'S WIRELESS SERVICE OFFERING SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC TO SERVE THE DESIGNATED AREAS.

A. ETC Legal Requirements

Section 254(e) of the Communications Act of 1934 ("the Act"), 47 U.S.C. § 254(e), provides that "only an eligible telecommunications carrier designated under section 214(e) of this title shall be eligible to receive specific Federal universal service support." The Act requires state commissions to designate as an ETC, throughout the service area for which ETC status is sought, any common carrier that: (i) offers services that are supported by federal universal service support mechanisms, either using its own facilities or a combination of its own facilities and resale of another carrier's facilities, and (ii) advertises the availability of such services and the charges using media of general distribution. 47 U.S.C. § 214(e)(1)-(2).

1. Eligibility and Identification of the Service Area.

Budget is a common carrier as that term is defined in the Act⁶ and, as such, is eligible for designation as an ETC. Further, Budget has received ETC status in Kentucky for its wireline services. Budget is currently requesting that its ETC status be extended to include wireless services, and the FCC has recognized that telecommunications providers offering wireless services are eligible to be designated as ETCs.⁷

Section 214(e)(2) of the Act provides that ETC designation shall be made for a "service area" designated by the state commission. Subsection (5) provides that the "service area" shall be a "geographic area established by the State commission." Attached hereto as Exhibit A is a

⁶ 47 USC § 153(h)(10).

⁷ Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, 8858-59 (1997) ("First Report and Order").

list of the exchanges for which Budget is seeking ETC authority for its wireless services, consisting of wire centers of AT&T, Cincinnati Bell, and Windstream.

2. Supported Services

Section 214(e)(1)(A) of the Act requires that an ETC offer the services that are supported by federal universal service support mechanisms (“Supported Services”) either using its own facilities or a combination of its own facilities and resale of another carrier’s services. Budget will provide each of these required services, identified in 47 C.F.R. § 54.101 throughout the designated service area utilizing a combination of its own facilities and resale of wireless services, as indicated below:

1. Voice-grade access to the public switched telephone network — Budget will provide its customers with the ability to make and receive calls on the public switched telephone network.
2. Local Usage
 - “Local usage” means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users.”⁸ The FCC has interpreted its rule as requiring carriers to offer customers rate plans offering varying amounts of local usage.⁹
 - Though Budget may ultimately decide to expand the number of Lifeline service plan options available to eligible Lifeline customers, Budget intends to initially offer qualifying customers an “unlimited talk & text” wireless plan that will provide unlimited local usage, as well as another plan with 250 free minutes of local usage. These plans satisfy the “local usage” requirement.
3. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent — Budget satisfies this requirement by providing signaling that is functionally equivalent to DTMF.
4. Single-party service or its functional equivalent — Budget will meet this requirement by providing a dedicated message path for the length of its subscribers’ calls.
5. Access to emergency services
 - “Access to emergency service” includes access to services, such as 911 and enhanced 911 (“E-911”), provided by local governments or other public safety organizations.

⁸ 47 C.F.R. §54.101(a)(2).

⁹ See *Western Wireless Corp., Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Rcd 48, 52 ¶ 10 (2000).

- All of the phones that Budget distributes are capable of delivering automatic numbering information (“ANI”) and automatic location information (“ALI”), and otherwise satisfy applicable state and federal E-911 requirements.
6. Access to operator services
- “Access to operator services” means access to automated or live operator assistance provided to a customer to arrange for billing or completion, or both, of a telephone call.
 - Budget meets this requirement through its own live operators employed by Budget that are available to assist customers.
7. Access to interexchange service
- With respect to wireless carriers, “access to interexchange service” means access to the functional equivalent of the use of the wireline telecommunications loop, as well as that portion of the switch that is paid for by the end user, necessary to access an interexchange carrier’s network.
 - Budget meets this requirement by providing all of its subscribers with the ability to make and receive interexchange or toll calls. Budget will rely on its own switches located in Dallas, Texas, and Shreveport, Louisiana, to provide access to some inter-exchange services (for routing certain domestic and all non-domestic calls).
8. Access to directory assistance
- “Access to directory assistance” means access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings.
 - Budget meets this requirement by providing access to directory assistance by Budget operators. Budget subscribers will be able to dial 411 or #4007 to reach directory assistance from their mobile phones. Budget’s own switches and facilities will be used to provide access to directory assistance.
9. Toll limitation for qualifying low-income consumers
- “Toll limitation” includes the offering of either “toll control” or “toll blocking” to qualifying low-income customers, as a means of limiting or blocking the completion of outgoing toll calls.
 - Budget will offer toll limitation service using its own facilities to qualifying low-income customers, as requested.

3. Advertising Supported Services

Section 214(e)(1)(B) of the Act requires that an ETC advertise the availability of Supported Services and the related charges using media of general distribution. ETCs are also required to publicize the availability of Lifeline and Link Up services in a manner reasonably

designed to reach those likely to qualify for such services.¹⁰ Budget will advertise the availability of the Supported Services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services. Budget will use a variety of media resources, including point of sale material of various kinds, onsite merchandising, banners, customer direct mail, customer brochures, television, and print media.

4. Provision of Supported Services Through the Use of Own Facilities and Resale of Another Carrier's Services

Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities¹¹; 47 C.F.R. § 54.201(i) prohibits ETC designation for a telecommunications carrier that offers Supported Services exclusively through the resale of another carrier's services. "A common carrier designated as an eligible telecommunications carrier ... shall be eligible to receive universal service support ... and shall, throughout the service area for which the designation is received, ... [o]ffer the services supported by federal universal service support mechanisms ... either using its own facilities or a combination of its own facilities and resale of another carrier's services."¹² As explained by the FCC:¹³

We adopt the Joint Board's analysis and conclusion that a carrier need not offer universal service wholly over its own facilities in order to be designated as eligible because the statute allows an eligible carrier to offer the supported services through a combination of its own facilities and resale.

When a carrier, like Budget, is relying on a "combination" of resold services and those provided using its own facilities, a state commission is directed to grant ETC designation "irrespective of

¹⁰ 47 C.F.R. §§ 54.405(b), 54.411(d).

¹¹ The FCC has defined the term "facilities" to include "any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support." 47 C.F.R. § 54.201(e) (emphasis added).

¹² See 47 C.F.R. § 54.201(d)(1).

¹³ See First Report and Order at ¶169.

the technology”¹⁴ used by the applicant and cannot require the facilities to be in the “relevant service area” as long as the facilities are used “to provide services designated for support ... within the service area.”¹⁵ Further, there is no state or federal definition or requirement as to the number of or the amount of the Supported Services that an ETC must offer via its “own facilities.”¹⁶ The FCC stated in the First Report and Order, at ¶ 169, that:

Although the Joint Board did not reach this issue, we find that the statute does not dictate that a carrier use a specific level of its “own facilities” in providing the services designated for universal service support given that the statute provides only that a carrier may use a “combination of its own facilities and resale” and does not qualify the term “own facilities” with respect to the amount of facilities a carrier must use. For the same reasons, we find that the statute does not require a carrier to use its own facilities to provide each of the designated services but, instead, permits a carrier to use its own facilities to provide at least one of the supported services.

As long as an ETC offers any portion of the Supported Services through the use of its “own facilities,” whether or not such facilities are located in the designated service area, it will satisfy the “own facilities” requirement and qualify for both Lifeline and Link Up support.¹⁷

¹⁴ See 47 C.F.R. § 54.201(h).

¹⁵ See 47 C.F.R. § 54.201(g).

¹⁶ Federal law does not require any particular level of facilities. The FCC stated in the First Report and Order (at ¶ 169) that:

Although the Joint Board did not reach this issue, we find that the statute does not dictate that a carrier use a specific level of its “own facilities” in providing the services designated for universal service support given that the statute provides only that a carrier may use a “combination of its own facilities and resale” and does not qualify the term “own facilities” with respect to the amount of facilities a carrier must use. For the same reasons, we find that the statute does not require a carrier to use its own facilities to provide each of the designated services but, instead, permits a carrier to use its own facilities to provide at least one of the supported services.

¹⁷ It should be noted that the FCC, in the First Report and Order (at ¶ 153), expressed concerns that a strict interpretation of the term “facilities” would violate the FCC’s express policy of competitive neutrality stating:

We also decline to adopt a more restrictive definition of the term “facilities,” as some commenters suggest. For example, we reject the suggestion that we define “facilities” as both loop and switching facilities based on our concern that such a restrictive definition would erect substantial entry barriers for potential competitors seeking to enter local markets and, therefore, would unduly restrict the class of carriers that may be designated as eligible

Consistent with the requirements of 47 C.F.R. § 54.201(d)(1), Budget will rely on a combination of resold services (which the Company will obtain through agreements with its underlying wireless provider) and Budget-owned facilities (which consist of switches and facilities located in Dallas, Texas and Shreveport, Louisiana). Budget's own facilities and switches will be used to provide some of the Supported Services, including access to directory assistance, access to some interexchange services (for routing certain domestic and all non-domestic calls), the provision of toll limitation services and access to operator services, as that term is defined in 47 C.F.R § 54.101(a)(6). Through these means, Budget is able to offer all of the services and functionalities supported by the FUSF and KUSF throughout its designated service area,¹⁸ thereby allowing the Company to provide qualifying wireless service to its customers.

B. Additional Eligibility Criteria

The FCC, in its 3/17/05 Report and Order established additional criteria that all ETC applicants must satisfy in order to be designated as an ETC, which include: (1) a commitment and ability to provide the Supported Services throughout the designated area; (2) the ability to remain functional in emergency situations; (3) commitment to satisfy consumer protection and service quality standards; (4) offering local usage comparable to that offered by the incumbent LEC; and (5) an acknowledgement that it may be required by the FCC to provide equal access if all other ETCs in the designated service area relinquish their designation pursuant to Section 214(e)(4) of the Act.¹⁹

telecommunications carriers. Rather, we conclude that the definition of "facilities" that we adopt will serve the goals of universal service and competitive neutrality to the extent that it does not dictate the specific facilities that a carrier must provide or, by implication, the entry strategy a carrier must use and, therefore, will not unduly restrict the class of carriers that may be designated as eligible.

¹⁸ See 47 C.F.R. § 54.101(a).

¹⁹ See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 20 FCC Rcd 6371 (2005) ("ETC Order"), at ¶ 20.

1. Commitment and Ability to Provide the Supported Services

The FCC's rules at 47 C.F.R. § 54.202(a) (1) require an ETC to demonstrate its commitment to provide the Supported Services throughout the designated service area by: (A) committing to provide service throughout its designed service area to customers who make a reasonable request for service; and (B) submitting a five-year plan demonstrating how high-cost universal service support will be used to improve its coverage, service quality and capacity.

a. Commitment to Serve All Customers Making a Reasonable Request for Service

If designated as a wireless ETC, Budget will provide service through a combination of its own facilities and the resale of services acquired from a wireless provider through existing negotiated and executed agreements. As the wireless service provider and Budget's own facilities are already operational, Budget will be able to commence offering its Lifeline and Link Up service programs to all qualified consumers soon after it receives approval from the Commission and upon implementation of procedures and internal systems necessary, such as the distribution of sales materials to authorized agent locations. As a result, Budget will be able to meet the requirements of 47 C.F.R. § 54.202(a)(1).

b. Five Year Service Improvement Plan

The FCC required the filing of a Five Year Service Improvement Plan in 47 C.F.R. § 202. However, the requirement of the Plan appears to be intended to demonstrate the use of high-cost funds. Since Budget is not requesting any form of high-cost support, it believes this requirement to be inapplicable to its application.

2. Ability to Remain Functional in Emergency Situations

Section 54.202(a)(2), 47 C.F.R., requires that an ETC provide "[a] demonstration of the carrier's ability to remain functional in emergency situations...." Because Budget's services will be provided (at least in part) through resale they will be as reliable and provide all of the back-

ups and contingency plans of its underlying wireless service provider, which includes backup battery power at cell sites to ensure functionality in emergency situations. Additionally, Budget will have the ability to provide for the rerouting of traffic around damaged facilities, and management of traffic spikes resulting from emergency situations through its wireless service provider and its own facilities.

3. Consumer Protection and Commitment to Provide Quality Service

Budget (or its corporate predecessor) has been providing quality services to consumers in Kentucky for over 10 years. If designated as a wireless ETC, Budget will satisfy all consumer protection and service quality standards as provided in 47 C.F.R. § 54.202(a)(2), as well as all applicable state specific consumer protection and service quality standards and will commit that all FUSF support received by Budget will be directly reflected in the price that the eligible customer pays. In addition, Budget will certify compliance with the protection of Customer Proprietary Network Information as required by federal law and with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service as required by 47 C.F.R. § 54.202(a)(3). Through the use of resold services and its own facilities, Budget will be able to provide the same quality and reliability as that currently provided by any other wireless provider. Although no carrier can guarantee that its customers will never experience service disruptions, Budget's contractual arrangements and its own facilities are designed to minimize any failures, provide alternate call routing, and expedite recovery in the event a failure occurs.

4. Local Usage

An ETC is required to “[d]emonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.”²⁰ The FCC has explained that the local usage plans of an ETC applicant should be reviewed on a case-

²⁰ 47 C.F.R. § 54.202(a)(ii)(4).

by-case basis²¹ in order to ensure that each ETC is providing a local usage component as a part of its universal service offering that meets the FCC requirements. With respect to wireless service, to date, the FCC has not quantified an amount of local usage required to be included by an ETC in its universal service offering.²² Budget's ETC service will provide qualifying customers with an "unlimited talk & text" wireless plan that will provide unlimited local and domestic wireless usage, as well as a free plan providing 250 minutes of local and domestic toll usage. Budget's local usage plans satisfy the "comparable local usage" requirement.

5. Equal Access

Section 54.202(a)(5), 47 C.F.R., requires an acknowledgment from a prospective ETC that it may be required to "provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the designated service area."²³ Budget acknowledges that it may be required to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the designated service area, subject to its obligations under federal law.

III. INCLUDING WIRELESS SERVICE IN BUDGET'S ETC DESIGNATION WILL SERVE THE PUBLIC INTEREST.

A. Public Interest

Although "Congress did not establish specific criteria to be applied under the public interest test,"²⁴ the FCC did establish that "the public interest benefits of a particular ETC designation" should be analyzed in a manner consistent with the Act's purposes, including the "goals of preserving and advancing universal service, ensuring the availability of quality telecommunications at just, reasonable, and affordable rates, and promoting the deployment of advanced

²¹ See ETC Order at ¶ 33.

²² See ETC Order at ¶ 32.

²³ 47 C.F.R. § 54.202(a)(5).

²⁴ ETC Order at ¶ 40.

telecommunications and information services to all regions of the nation, including rural and high-cost areas.”²⁵ The FCC “will consider a variety of factors in the overall ETC determination, including the benefits of increased consumer choice, and the unique advantages and disadvantages of the competitor’s service offering.”²⁶

The Commission has previously ruled that Budget’s wireline service meets these requirements and Budget has the financial resources and commitment to bring quality, cost-effective communications services to Kentucky consumers, and has done so for years. The Company believes that providing discounted wireless service is also consistent with the public interest and provides the following information clearly demonstrating that Budget’s inclusion of the wireless service in its designation as an ETC is consistent with the public interest, convenience, and necessity, providing consumers with increased competitive choice through the offering of a unique service at rates that are just, reasonable, and affordable.

The public interest benefits associated with the Company’s wireless service include larger local calling areas (as compared to traditional wireline carriers) and the convenience, security and mobility afforded by mobile telephone service. Further, Budget’s offerings provide the opportunity for customers to select from various options ranging from a high-value wireless plan that provides unlimited local and domestic long distance and texting, to a free plan that includes 250 calling minutes. The ability of the customer to select between prepaid offerings that include unlimited local and domestic calling or limited-minute plans removes the risk of any customer becoming burdened with large and unexpected toll charges and unexpected overage charges. Additionally, wireless service greatly benefits consumers who routinely drive long

²⁵ *Id.*

²⁶ ETC Order at ¶ 41.

distances to attend work or school or to accomplish everyday tasks such as shopping or attending community and social events.

Budget's unique pre-paid option is designed to provide consumers who, due to credit or deposit requirements, may not be able to obtain the safety and convenience of telephone service from traditional providers, and a Budget customer is never obligated for more than 30 days. Unlike many wireless providers, as indicated above, Budget's service offering is a high-value wireless service that includes unlimited local and domestic long distance calling, unlimited text messaging, caller ID, call waiting and voicemail, all without the requisite credit check, deposit, and contract requirements of the more traditional wireline and wireless service providers. Through the Link Up program, Budget will be able to provide consumers with a reduction in the cost of the customary fees associated with the connection of service. Because Budget's service is provided with no credit check, deposit requirement, minimum service periods, or early termination fees, the service will be an attractive and affordable alternative to qualified low-income consumers without regard to age, residency, or creditworthiness.

The wireless service offered by Budget will provide consumers with a convenient and affordable alternative to traditional telecommunications service that can be used while at home and away from home. Because of these benefits, Budget expects that many qualified consumers will select the wireless Lifeline and Link Up service in lieu of the more traditional wireline or wireless services.

B. Lifeline Service

Budget will offer two wireless prepaid FUSF/KUSF offerings throughout its designated service area: the Unlimited Talk and Text Plan, and the Free 250 Plan. A summary of each is provided below.

Unlimited Talk and Text: This prepaid service provides unlimited local and domestic long distance calling, unlimited texting, caller ID, call waiting and voicemail. Customers can add international long distance at \$5.00 intervals and data/pic packages for \$15.00. Customers will receive a free handset or can purchase an upgraded handset from Budget. Service payments will be made at participating Budget agent retail outlets frequented by low-income customers through the designated service area.

Unlimited Talk and Text Plan	\$45.50
Lifeline Credit	<u>(\$13.50)</u>
Unlimited Talk and Text Lifeline Price	\$ 32.00

Free 250 Plan: This prepaid service provides 250 minutes of local and domestic long distance calling, caller ID, call waiting and basic voicemail. Customers will receive a free handset or can purchase an upgraded handset from Budget. Customers can add additional airtime in denominations and at the rates indicated below. Customers also can purchase international long distance at \$5.00 intervals, data/pic packages at \$15.00 and unlimited texting at \$10.00. Service payments will be made at participating Budget agent retail outlets frequented by low-income customers through the designated service area.

250 Minute Plan	\$25.00
Minimum Lifeline Credit	<u>(\$25.00)²⁷</u>
Free 250 Lifeline Price	FREE
Additional minutes	
\$ 5.00	50 minutes
\$10.00	100 minutes
\$15.00	150 minutes

²⁷ Budget will provide support above the \$3.50 Tier 3 level at its own expense to ensure that Lifeline customers have the opportunity to obtain 250 free minutes.

Service payments will be made at participating Budget agent retail outlets frequented by low-income customers through the designated service area.

C. Link Up Service

Assistance under the Link Up program is in the form of a “reduction in the carrier’s customary charge for commencing telecommunications service for a single telecommunications connection” and “shall be half of the customary charge or \$30.00, whichever is less.”²⁸ Consistent with FCC requirements, Budget will use Link Up support to reduce the Company’s “customary charge for commencing service” for eligible residents.

Qualifying subscribers will have the option of deferring the reduced activation charge over a twelve-month period with no interest, allowing subscribers to obtain service without being required to pay any up-front fees to activate service with Budget.

IV. BUDGET WILL COMPLY WITH THE LIFELINE AND LINK UP CERTIFICATION AND VERIFICATION REQUIREMENTS.

Sections 54.410 and 54.416 of the FCC’s rules require ETCs to comply with the requirements of initial certification of eligibility and the verification of continued eligibility for participation in the Lifeline and Link Up programs. Budget commits that it will certify and verify consumer eligibility in accordance with applicable FCC rules governing both certification and verification of Lifeline and Link Up eligibility. Budget has developed a detailed compliance policy that includes the Company’s procedures for initial certification of eligibility and the verification of continued eligibility for participation in these vital low-income programs and will make these materials available to the Commission upon request.

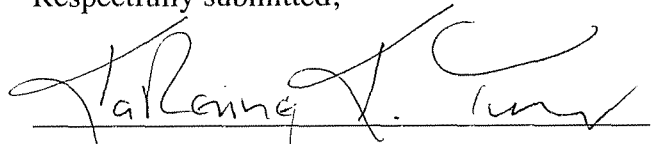
V. RELIEF REQUESTED

Based on the foregoing, Budget respectfully requests that the Commission:

²⁸ See 47 C.F.R. § 54.411(a)(1).

- A. Set a procedural schedule for consideration of the Application;
- B. Designate Budget as a wireless ETC for purposes of receiving FUSF and KUSF support for low-income assistance in Kentucky;
- C. Designate the area served by the Exhibit A wire centers of non-rural ILECs AT&T, Cincinnati Bell, and Windstream as the service area within which Budget shall offer wireless low-income universal Supported Services;
- D. Send appropriate notice of the designation order to the FCC and the Universal Service Administrative Company; and
- E. Order such other relief as may be appropriate.

Respectfully submitted,



Katherine K. Yunker
yunker@desuetude.com
YUNKER & PARK PLC
P.O. Box 21784
Lexington, KY 40522-1784
Phone: 859-255-0629
Fax: 859-255-0746

ATTORNEY FOR BUDGET PREPAY, INC.

**Budget Wireless ETC Designation
WIRE CENTERS LIST**

Company	Wirecenter	Locality	Exchange	Type
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ALLNKYMA	ALLEN	ALLEN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AURRKYMA	AURORA	AURORA	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BDFRKYMA	BEDFORD	BEDFORD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BGDDKYMA	BAGDAD	BAGDAD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLFDKYMA	BLOOMFIELD	BLOOMFIELD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLSPKYMA	BLUFF SPG	BLUFF SPRINGS	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BNLYKYMA	BENHAMLNCH	BENHAM-LYNCH	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BNTNKYMA	BENTON	BENTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BRGNKYMA	BURGIN	BURGIN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BRMNKYMA	BREMEN	BREMEN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BRTWKYES	BARDSTOWN	BARDSTOWN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BVDMKYMA	BEAVER DAM	BEAVER DAM	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BWLGKYMA	WOODBURN	WOODBURN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BWLGKYRV	BOWLINGGREEN	BOWLING GREEN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BYVLKYMA	BEATTYVL	BEATTYVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CADZKYMA	CADIZ	CADIZ	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHPLKYMA	CHAPLIN	CHAPLIN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLAYKYMA	CLAY	CLAY	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLHNKYMA	CALHOUN	CALHOUN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLPTKYMA	CLOVERPORT	CLOVERPORT	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLTNKYES	CLINTON	CLINTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CMBGKYMA	CAMPBELSBG	CAMPBELLSBURG	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CNCYKYMA	CENTRAL CY	CENTRAL CITY	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CNTNKYMA	CANTON	CANTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CNTWKYMA	CENTERTOWN	CENTERTOWN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	COTNKYMA	CROFTON	CROFTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRBNKYMA	CORBIN	CORBIN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRBOKYMA	CRAB ORCH	CRAB ORCHARD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRLSKYMA	CARLISLE	CARLISLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRTNKYMA	CARROLLTON	CARROLLTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CYDNKYMA	CORYDON	CORYDON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CYNTKYMA	CYNTHIANA	CYNTHIANA	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DAVLKYMA	DANVILLE	DANVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DIXNKYMA	DIXON	DIXON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DRBOKYES	DRAKESBORO	DRAKESBORO	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DWSPKYES	DAWSON SPG	DAWSON SPRINGS	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EDVLKYMA	EDDYVILLE	EDDYVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EKTNKYMA	ELKTON	ELKTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ELCYKYES	ELKHORN CY	ELKHORN CITY	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EMNKNYES	EMINENCE	EMINENCE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EMNKNYPL	EMINENCE	EMINENCE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ENSORKYMA	ENSOR	ENSOR	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ERTNKYMA	EARLINGTON	EARLINGTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FDCKKYES	FEDSCREEK	FEDSCREEK	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FDVLKYMA	FORDSVILLE	FORDSVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FEBRKYMA	FREEBURN	FREEBURN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FKLNKYMA	FRANKLIN	FRANKLIN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FLTNKYMA	FULTON	FULTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FNVLYMA	FINCHVILLE	FINCHVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FORDKYMA	FORD	FORD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRDNKYMA	FREDONIA	FREDONIA	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRFTKYES	FRANKFORT	FRANKFORT	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRFTKYMA	FRANKFORT	FRANKFORT	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GBVLKYMA	GILBERTSVL	GILBERTSVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GHNTKYMA	GHENT	GHENT	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GNVLKYMA	GREENVILLE	GREENVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GRACKYMA	GRACEY	GRACEY	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GRTWKYMA	GEORGETOWN	GEORGETOWN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GTHRKYMA	SO GUTHRIE	SOUTH GUTHRIETN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HABTKYMA	HABIT	HABIT	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HANSKYMA	HANSON	HANSON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HBVLKYMA	HEBBARDSVL	HEBBARDSVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HCMNKYMA	HICKMAN	HICKMAN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HDBGKYMA	HARRODSBG	HARRODSBURG	Non-rural

**Budget Wireless ETC Designation
WIRE CENTERS LIST**

Company	Wirecenter	Locality	Exchange	Type
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HNSNKYMA	HENDERSON	HENDERSON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HPVLKYMA	HOPKINSVL	HOPKINSVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HRBGKYES	HARDINSBG	HARDINSBURG	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HRFRKYMA	HARTFORD	HARTFORD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HRLNKYMA	HARLAN	HARLAN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HWVLKYMA	HAWESVILLE	HAWESVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	INEZKYMA	INEZ	INEZ	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ISLDKYMA	ISLAND	ISLAND	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JCSNKYMA	JACKSON	JACKSON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JNCYKYMA	JUNCTIONCY	JUNCTION CITY	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KKVLKYMA	KIRKSVILLE	KIRKSVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LBJTKYMA	LEBANONJCT	LEBANON JUNCTION	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LFYTKYMA	LA FAYETTE	LAFAYETTE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LGRNKYES	LA GRANGE	LAGRANGE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUSKYES	LOUISA	LOUISA	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LRBGKYMA	LAWRENCEBG	LAWRENCEBURG	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKY26	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYAN	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYAP	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYBE	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYBR	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYCW	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYFC	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYHA	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYJT	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYOA	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYSH	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYSL	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYSM	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYTS	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYVS	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LSVLKYWE	LOUISVILLE	LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LVMRKYMA	LIVERMORE	LIVERMORE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MACEKYMA	MACEO	MACEO	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MARNKYMA	MARION	MARION	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MARTKYMA	MARTIN	MARTIN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCDNKYMA	MCDANIELS	MCDANIELS	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCWLKYMA	MCDOWELL	MCDOWELL	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MDBOKYMA	MIDDLESBO	MIDDLESBORO	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MDVIKYMA	MADISONVL	MADISONVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MGFDKYMA	MORGANFLD	MORGANFIELD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MGTWKYMA	MORGANTOWN	MORGANTOWN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MLBGKYMA	MILLERBURG	MILLERSBURG	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MLTNKYMA	MILTON	MILTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MRGPKYMA	MORTONSGAP	MORTONS GAP	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MRRYKYMA	MURRAY	MURRAY	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTEDKYMA	MOUNT EDEN	MT EDEN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTSTKYMA	MTSTERLING	MT STERLING	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MYFDKYMA	MAYFIELD	MAYFIELD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MYVLKYMA	MAYSVILLE	MAYSVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEBOKYMA	NEBO	NEBO	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEONKYES	NEON	NEON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NRVLKYMA	NORTONVL	NORTONVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NWHNKYMA	NEW HAVEN	NEW HAVEN	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OKGVKYES	OAK GROVE	OAK GROVE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OWBOKYMA	OWENSBORO	OWENSBORO	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OWTNKYMA	OWENTON	OWENTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PARSKYMA	LITTLEROCK	LITTLE ROCK	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PDCHKYIP	PADUCAH	PADUCAH	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PDCHKYLO	PADUCAH	PADUCAH	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PDCHKYMA	PADUCAH	PADUCAH	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PDCHKYRL	PADUCAH	PADUCAH	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIVLKYMA	PINEVILLE	PINEVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PKVLKYMA	PIKEVILLE	PIKEVILLE	Non-rural

**Budget Wireless ETC Designation
WIRE CENTERS LIST**

Company	Wirecenter	Locality	Exchange	Type
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PKVLKYMT	PIKEVILLE	PIKEVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PLRGKYMA	PLEASATRDG	PLEASANT RIDGE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PMBRKYMA	PEMBROKE	PEMBROKE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PNTHKYMA	PANTHER	PANTHER	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PNVLKYMA	PAINTSVL	PAINTSVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRBGKYES	PRESTONSBG	PRESTONSBURG	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRTNKYES	PRINCETON	PRINCETON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRVDKYMA	PROVIDENCE	PROVIDENCE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRVLKYMA	PERRYVILLE	PERRYVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PTRYKYMA	PORT ROYAL	PORT ROYAL	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RBRDKYMA	ROBARDS	ROBARDS	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RCMDKYMA	RICHMOND	RICHMOND	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RLVLKYMA	RUSSELLVL	RUSSELLVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RSTRKYES	ROSETRRACE	ROSE TERRACE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SCRMKYMA	SACRAMENTO	SACRAMENTO	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SDVLKYMA	SADIEVILLE	SADIEVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SEBRKYMA	SEBREE	SEBREE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHGVKYMA	SHARON GRV	SHARON GROVE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHVLKYMA	SHELBYVL	SHELBYVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SLGHKYMA	SLAUGHTERS	SLAUGHTERS	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SLPHKYMA	SULPHUR	SULPHUR	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SLVSKYMA	SALVISA	SALVISA	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SNTNKYMA	STANTON	STANTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPFDKYMA	MOORESVL	MOORESVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SRGHKYMA	SORGHO	SORGHO	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SSVLKYMA	SIMPSONVL	SIMPSONVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STCHKYMA	ST CHARLES	ST CHARLES	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STFRKYMA	STANFORD	STANFORD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STGRKYMA	STAMPNGRND	STAMPING GROUND	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STNLKYMA	STANLEY	STANLEY	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STONKYMA	STONE	STONE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STRGKYMA	STURGIS	STURGIS	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SWSNKYMA	SOWILLIMSN	SOUTH WILLIAMSON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TRENKYMA	TRENTON	TRENTON	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TYVLKYMA	TAYLORSVL	TAYLORSVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	UTICKYMA	UTICA	UTICA	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	VIRGKYMA	VIRGIE	VIRGIE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WACOKYMA	WACO	WACO	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WDDYKYMA	WADDY	WADDY	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHBGKYMA	WHITESBURG	WHITESBURG	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHVLKYMA	WHITESVL	WHITESVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WLBGKYMA	WILLIAMSBG	WILLIAMSBURG	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WLCKKYES	WALLINSCRK	WALLINS CREEK	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WVLKYMA	W LOUISVL	WEST LOUISVILLE	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WNCHKYMA	WINCHESTER	WINCHESTER	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WNCHKYPV	WINCHESTER	WINCHESTER	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WRFDKYMA	WARFIELD	WARFIELD	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WSBGKYMA	WILLISBURG	WILLISBURG	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WSPNKYMA	WEST POINT	WEST POINT	Non-rural
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WYLDKYES	WAYLAND	WAYLAND	Non-rural
CINCINNATI BELL, INC.	ALXNKYAL	ALEXANDRIA	ALEXANDRIA2	Non-rural
CINCINNATI BELL, INC.	BTLRKYBR	BUTLER	BUTLER	Non-rural
CINCINNATI BELL, INC.	BURLKYBN	BURLINGTON	BOONE1	Non-rural
CINCINNATI BELL, INC.	CRDCKYCT	WILLIAMSTN	WILLIAMSTOWN	Non-rural
CINCINNATI BELL, INC.	CVTNKYCN	COVINGTON	COVINGTON	Non-rural
CINCINNATI BELL, INC.	FLMOKYUA	FALMOUTH	FALMOUTH	Non-rural
CINCINNATI BELL, INC.	FLRNKYFL	FLORENCE	BOONE2	Non-rural
CINCINNATI BELL, INC.	FTTHKYFT	COVINGTON	COVINGTON	Non-rural
CINCINNATI BELL, INC.	GLCOKYGC	GLENCOE	GLENCOE	Non-rural
CINCINNATI BELL, INC.	INDPKYIN	INDEPNDCNCE	INDEPENDENCE1	Non-rural
CINCINNATI BELL, INC.	LKPKKYLP	COVINGTON	COVINGTON	Non-rural
CINCINNATI BELL, INC.	UNINKYAC	UNION	BOONE1	Non-rural
CINCINNATI BELL, INC.	WLTNKYWL	WALTON	WALTON1	Non-rural
CINCINNATI BELL, INC.	WLTWKYWT	WILLIAMSTN	WILLIAMSTOWN	Non-rural

**Budget Wireless ETC Designation
WIRE CENTERS LIST**

Company	Wirecenter	Locality	Exchange	Type
CINCINNATI BELL, INC.	WRSWKYWR	WARSAW	WARSAW	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	ALBYKYXA	ALBANY	ALBANY	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	ASLDKYXA	ASHLAND	ASHLAND	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BEREKYXA	BEREA	BEREA	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BRSDKYXA	BURNSIDE	BURNSIDE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BRVLKYXA	BRADFODSVL	BRADFORDSVILLE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BSVLKYXA	BURKESVL	BURKESVILLE2	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BTVLKYXA	BRYANTSVL	BRYANTSVILLE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	CECLKYXA	CECILIA	CECILIA	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	CLMAKYXA	COLUMBIA	COLUMBIA	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	CMVLKYXA	CAMPBELSVL	CAMPBELLSVILLE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	CTBGKYXA	CATLETTSBG	CATLETTSBURG	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	EWNGKYXA	EWING	EWING	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	EZTWKYXA	ELIZABHTN	ELIZABETHOWN	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	FMBGKYXA	FLEMINGSBG	FLEMINGSBURG	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GLSGKYXA	GLASGOW	GLASGOW1	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GNBGKYXB	GREENSBURG	GREENSBURG	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GNUPKYXA	GREENUP	GREENUP	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GRSNKYXA	GARRISON	GARRISON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GYSNKYXA	GRAYSON	GRAYSON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	HGVLKYXA	HODGENVL	HODGENVILLE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	HLBOKYXA	HILLSBORO	HILLSBORO	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	HTVLKYXE	HUSTONVL	HUSTONVILLE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	HZRDKYXA	HAZARD	HAZARD	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LBNNKYXA	LEBANON	LEBANON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LBRTKYXA	LIBERTY	LIBERTY	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LNCSKYXA	LANCASTER	LANCASTER	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LRTTKYXA	LORETTO	LORETTO	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LTFDKYXA	LEITCHFLD	LEITCHFIELD	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LXTNKYUK	LEXINGTON	LEXINGTON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LXTNKYXA	LEXINGTON	LEXINGTON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LXTNKYXB	LEXINGTON	LEXINGTON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LXTNKYXC	LEXINGTON	LEXINGTON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LXTNKYXD	LEXINGTON	LEXINGTON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LXTNKYXE	LEXINGTON	LEXINGTON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LXTNKYXF	LEXINGTON	LEXINGTON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LXTNKYXG	LEXINGTON	LEXINGTON	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	MDWYKYXA	MIDWAY	MIDWAY	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	MEDSKYXA	MEADS	MEADS	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	MNTIKYXA	MONTICELLO	MONTICELLO	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	MRHDKYXA	MOREHEAD	MOREHEAD	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	NANCKYXA	NANCY	NANCY	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	NCVLKYXA	NICHOLASVL	NICHOLASVILLE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	OLHLKYXA	OLIVE HILL	OLIVE HILL	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	OWVLKYXA	OWINGSVL	OWINGSVILLE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	PNLCKYXE	PAINT LICK	PAINT LICK	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	RSSLKYXB	RUSSELL	RUSSELL	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SCVLKYXA	SCOTTSVL	SCOTTSVILLE1	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SHBGKYXA	SHARPSBURG	SHARPSBURG	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SHDNKYXA	SO HARDIN	SOUTH HARDIN	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SLLCKYXA	SALT LICK	SALT LICK	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SMRTKYXA	SOMERSET	SOMERSET	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SSHRKYXA	SOUTHSHORE	SOUTH SHORE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	TLBOKYXA	TOLLESBORO	TOLLESBORO	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	TMVLKYXA	TOMPKINSVL	TOMPKINSVILLE	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	VICCKYXA	VICCO	VICCO	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	VNBGKYXA	VANCEBURG	VANCEBURG	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	VRSLKYXA	VERSAILLES	VERSAILLES	Non-rural
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WLMRKYXA	WILMORE	WILMORE	Non-rural