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STATE OF FLORIDA



OFFICE OF TELECOMMUNICATIONS  
BETH W. SALAK  
DIRECTOR  
(850) 413-6600

Public Service Commission

October 30, 2012

RECEIVED FPSC  
12 OCT 31 PM 3:07  
COMMISSION  
CLERK

Jon Moyle, Jr.  
Moyle Law Finn  
118 North Gadsden Street  
Tallahassee, FL 32301

Re: Docket No. 120231-TP

Staff's First Data Request

Dear Mr. Moyle:

By this letter, the Commission staff requests that Budget provide responses to the attached data request. Please provide Budget's responses concurrent with its response to AT&T Florida's October 19, 2012, Notice of Commencement of Collection Action. This response is currently scheduled to be received by November 7, 2012.

Budget may avail itself of the statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, if it believes it is necessary to comply with this data request. Please submit the requested information to Greg Fogleman, Office of Telecommunications, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850. Please call Greg at (850) 413-6574 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth W. Salak".

Beth W. Salak  
Director of Telecommunications

BWS:gf  
Enclosure

cc: Katherine King  
Randy Young  
Randy Cangelosi

Carrie Tournillon  
Tracy Hatch  
Charles Murphy

Ann Cole

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**Florida Public Service Commission**  
**Docket No. 120231-TP**  
**Staff Data Request to Budget Prepay, Inc.**  
**October 30, 2012**

For purposes of this staff data Request:

“AT&T Long distance” refers to BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service;

“AT&T Florida” refers to BellSouth Telecommunications, LLC d/b/a AT&T Florida; and

“Budget” refers to Budget Prepay, Inc.

1. Has AT&T Long Distance billed Budget for its services provided to Florida customers? If yes, please provide the complete billing record for June, July, and August 2012, specifying which itemized amounts are in dispute in Florida, and which amounts are not in dispute.
2. Does AT&T Florida bill Budget for AT&T Long Distance’s services that are provided in Florida? If yes, please provide the complete billing record for June, July, and August 2012, specifying which itemized amounts are in dispute, and which amounts are not in dispute.
3. Does AT&T Florida or any of its affiliates or subsidiaries bill Budget for any service(s) other than long distance? If yes, please identify those services and provide the complete billing record for June, July, and August 2012, specifying which itemized amounts are in dispute, and which amounts are not in dispute.
4. Does AT&T Florida bill Budget’s end users for AT&T Long Distance’s Services?
5. Does AT&T Long Distance bill Budget’s end users for AT&T Long Distance’s Services?
6. How many customers did Budget have in Florida during each of the following months: June, July, and August 2012?
7. How many Budget end users subscribed to AT&T Long Distance in Florida during each of the following months: June, July, and August 2012?
8. How many Budget customers in Florida received Lifeline discounts in Florida during each of the following months: June, July, and August 2012?
9. Has Budget notified its customers of its impending discontinuance of service?

- a) If yes, on what date was the notification provided to customers?
- b) If yes, please provide a copy of the notice.

- 10. Please provide all documentation Budget provided to AT&T Florida which supports Budget's position regarding the disputed amount(s) that are at issue in this docket for June, July, and August 2012.
- 11. Please provide all documentation Budget provided to AT&T Long Distance which supports Budget's position regarding the disputed amount(s) that are at issue in this docket for June, July, and August 2012.
- 12. Please identify all services included on the bills that AT&T Florida provides to Budget.
- 13. Are the promotions in dispute in this docket monthly credits?
- 14. Are the promotions in dispute in this docket one-time credits associated with establishing new service?
- 15. Are the promotions in dispute in this docket one-time credits associated with adding new services?
- 16. Are the promotions in dispute in this docket some combination of monthly and one-time credits?
- 17. To the extent that the promotions in dispute in this docket represent some combination of monthly and one-time credits, please identify the disputed amounts by category for each of the following months: June, July, and August 2012.