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December 28, 2004
Via overnight only

210 N. Park Ave.
Winter Park, FL 32789
P.O. Drawer 200
Winter Park, FL 32790-0200
Attn: Office of the Secretary

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

DOCKET FILE COPY ORIGINAL

Re: CC Docket No. 00-257 --
Tel: 407-740-8575 Transfer of local exchange service subscribers from Working Assets Funding
Fax: 407-740-0613 Services, Inc. to Trinsic Communications, Inc. f/k/a Z-Tel Communications, Inc.
tmi@tminc.com

Dear Ms. Dortch:

Pursuant to CC Docket No. 00-257 and in accordance with Section 64.1120(e)(1) of the Commission's rules, Trinsic Communications, Inc. f/k/a Z-Tel Communications, Inc. ("Trinsic") hereby notifies the Commission that it has entered into an agreement with Working Assets Funding Services, Inc. ("WAFS") whereby Trinsic will acquire local exchange service subscribers from WAFS. WAFS current provides local exchange and long distance services to its customers, however, WAFS now plans to cease provision of local exchange service, and under the terms of the agreement, will transfer its customers' local service to Trinsic.

As reflected in the customer notification, included as Attachment "A", affected customers will not experience any other changes with respect to their current services. The proposed transfer will affect approximately 8413 local exchange customers located in 14 states. The proposed date for the customer transfer is January 10, 2004. Once the proposed transaction is consummated, Trinsic will provide local exchange services to these customers.

Trinsic hereby certifies that it has complied with the advance subscriber notification requirements set forth in Section 64.1120(e)(3) of the Commission's rules, with the obligations specified in that notice and with Commission requirements that apply to this streamlined process, except as set forth in the accompanying petition for waiver.

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Ms. Marlene H. Dortch
December 28, 2004
Page 2

Four copies of this letter are also enclosed. A receipt copy is enclosed as well. Please date stamp the receipt copy and return it in the self addressed, stamped envelope provided.

If you have any questions with respect to this letter, please direct them to the undersigned below at (407)-740-3005 or rnorton@tminc.com.

Sincerely,

A handwritten signature in black ink that reads "Robin Norton" with a stylized flourish at the end.

Robin Norton
Consultant to Trinsic

Enclosures

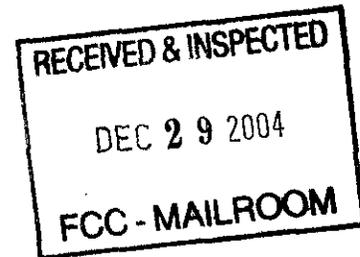
File: Trinsic - Working Assets - FCC
tms: FCC0400x



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Re: CC Docket No. 00-257 --
Transfer of local exchange service subscribers from Working Assets Funding Services, Inc. to Trinsic Communications, Inc. f/k/a Z-Tel Communications, Inc.
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Fax: 407-740-0613
tmi@tminc.com

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Consultant to Trinsic

Enclosures

File: Trinsic - Working Assets - FCC
tms: FCC0400x

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of CC Docket No. 00-257 --)
Transfer of local exchange service Subscribers)
of Working Assets Funding Services, Inc.)
to Trinsic Communications, Inc.)
f/k/a Z-Tel Communications, Inc.)
File No. _____

PETITION FOR WAIVER

Pursuant to Section 1.746 of the Commission's Rules, 47 CFR § 1.746, Trinsic Communications, Inc. f/k/a Z-Tel Communications, Inc. ("Trinsic" or "Applicant") hereby requests a waiver of a portion of Section 64.1120(e)(3) of the Federal Communications Commission's (FCC) Rules, 47 C.F.R. Section 64.1120(e)(3), specifically, the required notification to customers concerning the potential lifting of their PIC freezes when a customer base is transferred from one carrier to another. Trinsic also requests a waiver of a portion of Section 64.1120(e)(1) of the Federal Communications Commission's (FCC) Rules, 47 C.F.R. Section 64.1120(e)(1), concerning the thirty-day notification requirement to the FCC of transfers of customer bases. In support of its petition, Trinsic submits this good faith explanation for the defect in its notification to customers and to the FCC.

As background, Trinsic is a nationwide provider of local and long distance service. Working Assets Funding Services, Inc. ("WAFS") is a provider of local and long distance services in 14 states. Both Trinsic and WAFS are currently authorized by the FCC to provide domestic interstate and international service. By letters dated October 15, 2004 and December 10, 2004, WAFS and Trinsic notified WAFS's customers of WAFS's plan to exit the local exchange business and to transfer the provision of its customers' local service to Trinsic. No change to WAFS's long distance service is contemplated in this transaction.

Trinsic recognizes that in 47 C.F.R. Section 64.1120(e)(3) requires notification to Customers regarding the lifting of a PIC freeze when transfers to other carriers are to take place. Prior to preparing and mailing notifications to customers, WAFS undertook a thorough review and determined that none of its current customers have established PIC freezes. Furthermore, the pending transfer

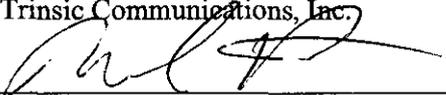
will not affect WAFS's long distance service and hence, no PIC freeze will be lifted at the time the transfer takes place. WAFS and Trinsic determined that including information on the lifting of a PIC freeze when no such event would occur, would unnecessarily confuse and alarm WAFS's customers. It is extremely important to both Trinsic and WAFS', as well as WAFS's customers, that the transfer of local service be carried out as smoothly as possible. For these reasons, Trinsic hereby requests that the Commission grant its Petition for Waiver of that portion of Rule 64.1120(e)(3) requiring that information regarding the lifting of PIC freezes be provided in this instance.

In addition, due to administrative oversight during the effort to plan and execute this transfer, the required 30 day notice to the Commission of the transfer is not timely filed if the transfer is still to be effected on January 10, 2005. It is vital to the interests of Trinsic and WAFS that the transfer not be delayed. For this reason, Trinsic requests a waiver of that portion of Rule 64.1120(e)(1) that requires that 30 days' notice be provided to the Commission, and that the Commission accept the notification submitted in conjunction with this filing on less than thirty days' notice.

Dated: December 23, 2004.

Respectfully submitted,
Trinsic Communications, Inc.

by



Michael Reith, Vice President
601 South Harbour Island Boulevard, Suite 220
Tampa, Florida 33602
Telephone: 813-273-6261
Facsimile: 813-273-6861

Consultant:
Monique Byrnes
Technologies Management, Inc.
P.O. Drawer 200
Winter Park, Florida 32790-0200
Telephone: (407) 740-8575
Facsimile: (407) 740-0613

Attachment A

Customer Notifications

December 28, 2004

«fname» «lname»
«addr1»
«addr2»
«city», «state» «zip»-«plus4»

Dear «fname» «lname»,

By joining Working Assets Local Service, you affirmed your commitment to Working Assets and a better world. Unfortunately, recent circumstances beyond our control are leading us to shut down our local phone service. Rest assured, your local service will remain in place as we work with you to complete this transition.

Why we're exiting the local business.

Like the other long distance companies, Working Assets has been able to provide local service by renting space on phone lines owned by SBC, Verizon and other dominant local players. Congress passed laws and the Federal Communications Commission (FCC) adopted rules that promoted local competition. However, recent FCC rulings and subsequent court decisions adversely affected our ability to provide you with local service at the competitive prices that you have enjoyed. To continue as your local service provider under these circumstances would be irresponsible. Instead, we want to concentrate on providing you with excellent long distance service at competitive prices and help you move your local service to your previous carrier or another carrier of your choice.

Working Assets is not alone in its decision to stop providing local service. You may have read recent news reports that even the major long distance companies, including AT&T, MCI, and Sprint, have dramatically scaled back or stopped providing local service to their residential customers. Obviously, the changes caused by the recent FCC and court decisions are changing the face of the entire local service industry. Unfortunately, smaller companies such as Working Assets are affected by these changes even more than the larger companies.

We need your help.

To make this transition as smooth as possible, **please contact «rboc» immediately to switch your local service** no later than December 15, 2004. Just follow these simple steps:

Call «rboc» at «call». Place an order to switch your **local service only**.

Tell «rboc» you want to keep your long distance and regional toll service with Working Assets. You'll get a superlow **2.9¢-a-minute rate** for your domestic state-to-state calling with a low \$5.95 monthly fee. Fill out the attached form and send it back in the postage-paid envelope.

- After you switch your local service, we'll give you a **credit on your long distance bill to cover fees** your new local company may charge you to switch your local service, up to \$35.

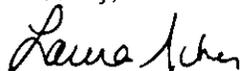
Keep your other socially responsible services.

The good news is, the change to your local service does not affect your long distance or wireless service. Although your new local phone company may ask you to switch your long distance away from Working Assets, we're asking that you respond to their offer with a polite but resounding, "No thanks." You can continue to support the causes you care about through our other services.

The Working Assets Local Customer Service team can answer your questions toll free at 866/334-8025.

Thank you again for your commitment to Working Assets and to the causes we all care about so deeply.

Sincerely,



Laura S. Scher, CEO
Working Assets

P.S. To read more about our decision to shut down our local service, please visit WorkingAssets.com/local.

FINAL – Exit Letter/Second Notice

November 15, 2004

«fname» «lname»
«addr1»
«addr2»
«city», «state» «zip»-«plus4»

Dear «fname» «lname»,

Last month Working Assets informed you of our decision to shut down our local phone service due to federal policy decisions beyond our control. We recommended you contact another local service company to carry your local calls. As of today, our records indicate you have not selected a new local carrier.

Working Assets is now working with our underlying carrier, Z-Tel Communications, Inc., as the local company to provide you with quality local service. If you do not select a new local carrier, we will automatically switch your local service to Z-Tel beginning January 10, 2005.

We'll handle the transition for you. You'll keep your current phone number and all of your current enhanced phone features. The monthly fee for Z-Tel's [basic local service, vm is variable] is [MSF merge field]. More importantly switching to Z-Tel is free and you'll now enjoy Working Assets Long Distance at the superlow rate of 2.9¢ a minute for your domestic state-to-state calling with a low \$5.95 monthly fee. For more information on Z-Tel and its services please visit ztel.com/XXX.

Stay connected to Working Assets Long Distance.

You'll continue to support the causes you care about with long distance service from Working Assets. With members like you, we hope to raise over \$4 million for nonprofit groups this year alone! Plus, you'll get a superlow 2.9¢-a-minute rate for your domestic state-to-state calling with a low \$5.95 monthly fee.

Questions? The Working Assets Local Customer Service team will be happy to help you at 866/334-8025.

Thanks again for being a part of Working Assets — and for your everyday commitment to equality, human rights, better schools and a clean environment.

Sincerely,



Laura S. Scher, CEO
Working Assets

P.S. To read more about our decision to discontinue providing local service, please visit WorkingAssets.com/local.

November 15, 2004

«fname» «lname»
«addr1»
«addr2»
«city», «state» «zip»-«plus4»

Re: Notice of Pending Local Service Transfer

Dear «fname» «lname»,

You recently received a letter from Working Assets, explaining their plan to exit the local telephone business. Working Assets has entered into an agreement with Z-Tel Communications, Inc. ("Z-Tel"), which enables you to keep your current phone number and all of your current enhanced phone features. There is no action required on your part to opt in, and this transfer will not affect the long distance service you currently enjoy with Working Assets.

You may choose a local service provider other than Z-Tel. Customers who wish to choose another telephone provider should contact that carrier no later than December 31, 2004. Please note that if you are a customer of Working Assets on the date of the transfer, and your new provider has not informed Working Assets that you have made arrangements on your own to switch to a telephone company other than Z-Tel, your account will automatically be transferred to Z-Tel on January 10th.

As a reminder, the monthly fee for Z-Tel's [basic local service, vrn is variable] is [MSF merge field]. More importantly switching to Z-Tel is free and you'll now enjoy Working Assets Long Distance at the super-low rate of 2.9¢ a minute for your domestic state-to-state calling with a low \$5.95 monthly fee. For more information on Z-Tel and its services please call Customer Care at 1-877-275-9835.

Please rest assured, the transition will have no impact on your current local service, nor will there be any interruption of service. The agreement between Z-Tel and Working Assets has been structured such that customers will not be charged any carrier change charges. If, however, such a charge does appear on a bill from another local telephone company as a result of the transfer of your service to Z-Tel, please call Z-Tel Customer Care toll-free at 1-877-275-9835 and we will reimburse you or credit your account accordingly.

Balances owed for services prior to the transition will remain payable to Working Assets. Any charges after the transition will be billed and payable to Z-Tel. Z-Tel and Working Assets have put in place audits to ensure the accurate distribution of any remittance received during and immediately following this transition, but ask for your help to ensure funds are separated and sent to the appropriate billing company based upon the invoices you receive.

Please note that any local service preferred carrier "freeze" you have placed on your existing telephone lines to prevent unauthorized transfer to another local carrier will be over-ridden for purposes of this transition, and will need to be reinstated by you after the transfer is complete.

Any questions you may have regarding your current services, service orders or complaints prior to the transfer should be addressed to Working Assets' customer service department at 1-866-334-8025.

About Z-Tel

Z-Tel is a nationwide provider of local, long distance and enhanced services and enjoys a solid reputation for customer service and innovation in the industry. For more information on Z-Tel and its offerings please review our website at www.z-tel.com or by calling toll-free at 1-877-275-9835.

Z-Tel looks forward to continuing to provide you with quality service for many years to come. In the meantime, if you have specific questions about this notice, please contact us at 1-877-275-9835.

Sincerely,

Z-Tel Communications, Inc.