

NOV 28 2012

FCC Mail Room

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FCC-Competition Policy Division

_____)	
In the Matter of)	
Section 63.71 Application of)	File No.
Working Assets Funding Service, Inc. dba)	
Credo Long Distance)	
)	
For Authority Pursuant to Section 214 of)	
The Communications Act of 1934, as Amended,)	
To Discontinue the Provision of Service)	
_____)	

**SECTION 63.71 APPLICATION OF
WORKING ASSETS FUNDING SERVICE, INC.
dba CREDO LONG DISTANCE**

Working Assets Funding Service, Inc. dba Credo Long Distance (“Working Assets”) submits this Application for authority under Section 214(a) of the Communications Act of 1934, as amended, and Section 63.71 of the Commission’s rules, to discontinue post-paid calling-card service to approximately 9,000 customers whose calling-card services are supported by a billing platform that Working Assets intends to decommission. Effective December 31, 2012, when the billing platform is decommissioned, affected customers will no longer receive post-paid calling-card service from Working Assets.

Pursuant to Sections 63.71 (a) and (b) of the Commission’s rules, Working Assets provides the following information:

1. Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):

Working Assets Funding Service, Inc. dba Credo Long Distance
101 Market Street, Suite 700
San Francisco, CA 94105

2. Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

Subject to the Commission's authorization to discontinue service pursuant to Section 63.71(c) of the Commission's rules, effective December 31, 2012, Working Assets will cease providing post-paid calling-card service to affected customers.

3. Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

Subject to the Commission's authorization, Working Assets will discontinue post-paid calling-card service to customers located in all states (except Alaska where Working Assets does not currently offer service) and the District of Columbia.

4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

Working Assets' post-paid calling card service has been provided as an additional service to its long distance subscribers and as a stand-alone service. Working Assets currently has approximately 9,000 customers who have post-paid calling cards. Effective December 31, 2012, however, Working Assets will have to decommission its billing platform that has supported post-paid calling-card service, and Working Assets will be unable to provide service to the affected customers once that billing platform is decommissioned. Affected customers' long distance service with Working Assets will not be impacted by the planned discontinuance of post-paid calling-card service.

Working Assets has informed customers that they may select a different provider for post-paid calling card service, and these customers have other options. The calling cards involved in this discontinuance are post-paid, and costs for calls using the calling card are billed to the customer's account. While once extremely popular, use of these cards has significantly declined. Pre-paid calling cards and mobile phones (both pre-paid and monthly plans) are widely available and are offered at competitive rates. Affected customers that desire post-paid

calling cards will have the opportunity to switch to other providers that offer the service at competitive rates. As a result, the public convenience and necessity should not be impaired by this discontinuance.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

Working Assets sent notices to affected customers by first class United States mail, postage pre-paid, on November 21, 2012. A copy of the notice is attached as Exhibit A.

Working Assets is sending copies of this Application by first class United States mail to the governor and public utilities commission for each affected state, as well as to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71 (b)(4)):

Working Assets is considered non-dominant with respect to the services to be discontinued.

Working Assets respectfully requests that the Commission approve this Application. Additional questions regarding this Application may be addressed to the undersigned.

Respectfully submitted,



Jean Parker, Legal Director
Working Assets Funding Service, Inc.
dba Credo Long Distance
101 Market Street, Suite 700
San Francisco, CA 94105
(415) 369-2053

November 21, 2012

Exhibit A



101 Market Street, Suite 700, San Francisco, CA 94105
credomobile.com • credoiondistance.com

November 20, 2012

[Redacted]



Re: Account number [Redacted]

Dear CREDO Member,

I'm writing to let you know that we'll be terminating our calling card and travel card services on December 31, 2012. Rest assured that this does not mean that CREDO is leaving the telecommunications business. We appreciate your making use of these services but we are moving to a new billing system and will not be able to continue providing calling card and travel card services. We're sending this notice nationwide to all of our customers who use our calling cards.

Your residential long distance service continues just as it did before and continues to generate donations for progressive causes. You do not need to do anything to continue to have CREDO residential long distance service.

If you need to continue to use a calling card, there are a number of other calling card options in your area. Get in touch with another telephone company before December 31, 2012, to sign up for a new calling card with a new provider.

We value your connection to CREDO and to the progressive causes we support. I hope we can meet all your communication needs with continued CREDO long distance service and CREDO Mobile service.

Sincerely,

Stephen Gunn
VP of Customer Relations
CREDO

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(over, please)

FCC required notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible but no later than 15 days after the commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Section 63.71 Application of Working Assets Funding Service Inc. DBA Credo Long Distance. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.



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[Redacted]



Re: Account number [Redacted]

Dear CREDO Member,

I'm writing to let you know that we'll be terminating our calling card and travel card services on December 31, 2012. Rest assured that this does not mean that CREDO is leaving the telecommunications business. We appreciate your making use of these services but we are moving to a new billing system and will not be able to continue providing calling card and travel card services. We're sending this notice nationwide to all of our customers who use our calling cards.

Your residential long distance service continues just as it did before and continues to generate donations for progressive causes. You do not need to do anything to continue to have CREDO residential long distance service.

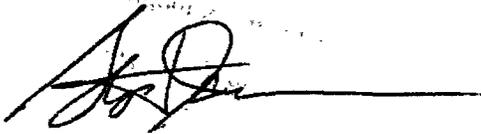
In addition, we offer excellent mobile service, CREDO Mobile, with voice plans that include free domestic long distance and start at just \$29.99 a month. CREDO Mobile has a great lineup of phones, including the Samsung Galaxy S III, the world's most popular smartphone. If you sign up for CREDO Mobile before 12/31, you can choose any handset – including the Galaxy S III for free! Call 888-800-4336 and mention special offer code 226800 or join online today at credomobile.com.

If you need to continue to use a calling card, there are a number of other calling card options in your area. Get in touch with another telephone company before December 31, 2012, to sign up for a new calling card with a new provider.

(over, please)

We value your connection to CREDO and to the progressive causes we support. I hope we can meet all your communication needs with continued CREDO long distance service and CREDO Mobile service.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Gunn", with a long horizontal line extending to the right.

Stephen Gunn
VP of Customer Relations
CREDO

FCC required notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible but no later than 15 days after the commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Section 63.71 Application of Working Assets Funding Service Inc. DBA Credo Long Distance. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st of November, 2012, I served a copy of the foregoing Section 63.71 Application of Working Assets Funding Service, Inc. dba Credo Long Distance by first class United States mail, postage pre-paid, to the parties on the attached service list.



Nathanael Bryant

1. 1000

2. 1000

3. 1000

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SERVICE LIST

ALABAMA

Lucy Baxley
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Alabama Public Service Commission
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Arizona Corporation Commission
Commissioners Wing
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