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January 23, 2014

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Section 63.71 Application of Telefonica Digital, Inc., d/b/a Jajah
WC Docket No. 13-309

Dear Ms. Dortch:

Telefonica Digital, Inc. (“TDI”) submits this letter in response to the very limited number of comments (three) that appeared in this docket in response to TDI’s petition to discontinue its domestic retail telecommunications service, known as “JAJAH.Direct.”¹

Each of the three commenters states that he or she is a JAJAH.Direct subscriber and laments the proposed discontinuance of the service. TDI appreciates that these three subscribers found the JAJAH.Direct service to be valuable for keeping in touch with their friends and family members overseas. However, after careful consideration, TDI has determined that, for business and other reasons, it no longer remains feasible for the company to operate the JAJAH.Direct service, particularly in light of the fiercely competitive, low-margin market in which the service operates. Simply put, JAJAH.Direct no longer fits into TDI’s future business plans, so the company is seeking to exit the market and focus on developing other applications and services.

As a practical matter, the discontinuance of JAJAH.Direct should have no effect whatsoever on the ability of these (and other) subscribers to access similar, affordable telecommunications services, as many continue to be offered by a wide range of competitors. For instance, Rebtel, Pingo, Callingcards.com, and Comfi.com, offer similar services at highly competitive rates. TDI provided its subscribers with ample notice of its plans to discontinue service, and these and other low-cost alternatives can easily be found via Internet searches.

¹ As was noted in TDI’s original Application in this docket, JAJAH.Direct is the only consumer-facing retail Jajah service subject to Section 214. Telefonica Digital, Inc. Section 63.71 Application to Discontinue Domestic Telecommunications Services, WC Docket No. 13-309, at 2 (filed Dec. 13, 2013) (“*TDI Domestic Retail Application*”).

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It also is worth reiterating that, as noted by TDI in its initial submission to the Commission, the JAJAH.Direct service, which employs dial-around functionality, requires subscribers to rely on their primary source of telecommunications service to use the service.² The discontinuance of JAJAH.Direct therefore would have no effect whatsoever on the continued availability to subscribers of their primary telecommunications service.

Finally, each of the three subscribers who commented here expressed concern that the proposed discontinuance would affect his or her ability to use JAJAH.Direct for *international* calling.³ In this regard, TDI respectfully notes that the discontinuance of international services is not within the scope of this proceeding, as it pertains only to domestic telecommunications service. As the Commission is aware, the discontinuance of non-dominant international service does not require Commission approval, and TDI already has notified the Commission's International Bureau of this proposed discontinuance, as required by Commission rules.⁴

For the foregoing reasons, the proposed discontinuance should be granted.

Respectfully submitted,



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² *TDI Domestic Retail Application*, at 3-4.

³ See Comments of Nadine Quiroz Sanchez, WC Docket No. 13-309 (filed Jan. 2, 2014) (discussing use of Jajah to communicate between Germany and parties in the United States, Japan, Switzerland, Austria and Mexico); Comments of Loren Kruger, WC Docket No. 13-309 (filed Dec. 11, 2013 in WC Docket No. 13-295) (discussing use of Jajah to communicate between the United States and South Africa).

⁴ See 47 C.F.R. § 63.19(a) (requiring customer and Commission notice, but not approval, for discontinuance of non-dominant international service).

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cc: Rodney McDonald
Kimberly Jackson