

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

**RECEIVED**  
NOV 26 2012  
SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

\_\_\_\_\_)  
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



**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.**



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

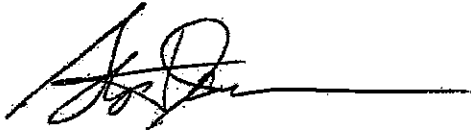
In addition, we offer excellent mobile service, CREDO Mobile, with voice plans that include free domestic long distance and start at just \$29.99 a month. CREDO Mobile has a great lineup of phones, including the Samsung Galaxy S III, the world's most popular smartphone. If you sign up for CREDO Mobile 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', followed by 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.



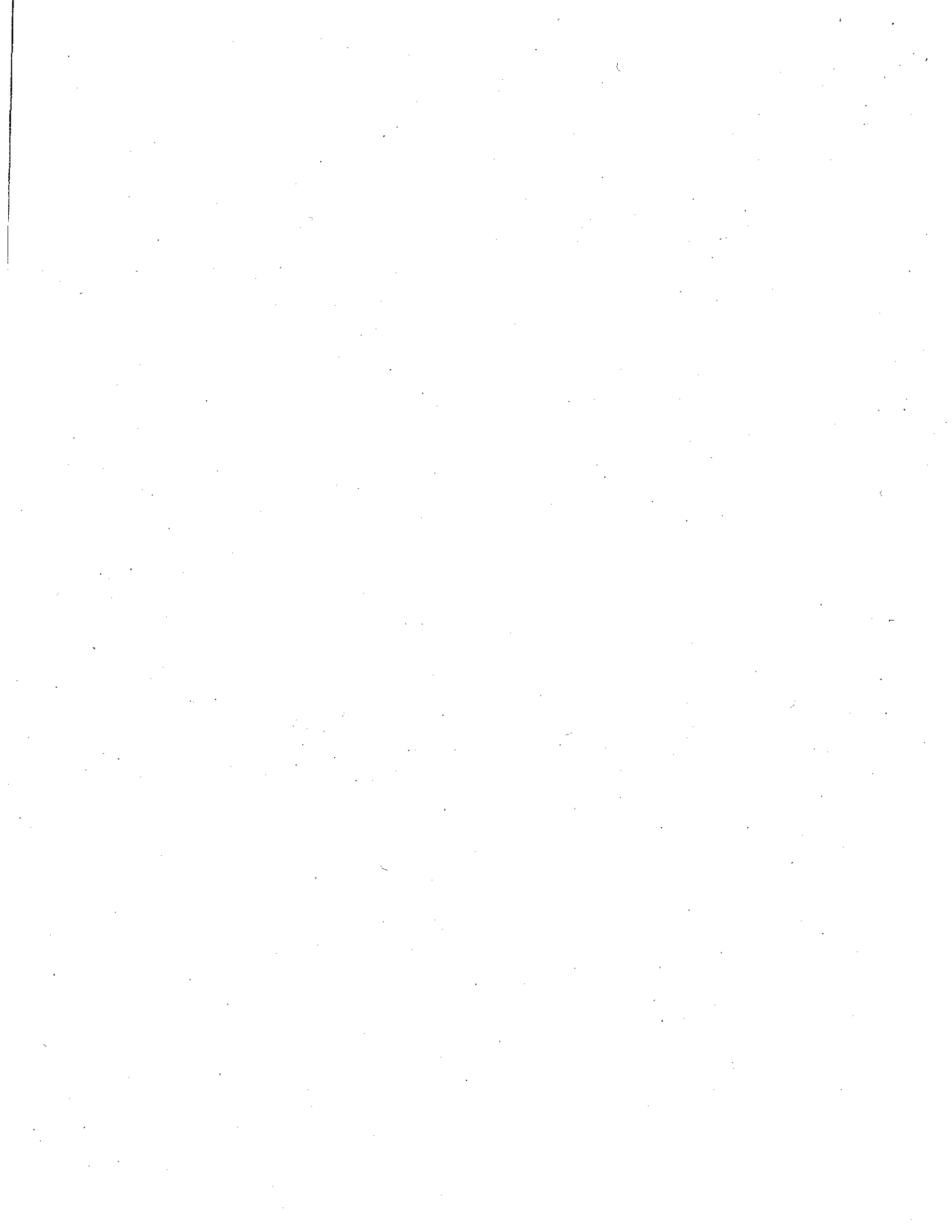
**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> 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



**SERVICE LIST**

**ALABAMA**

Lucy Baxley  
President  
Alabama Public Service Commission  
P.O. Box 304260  
Montgomery, AL 36130

The Honorable Robert J. Bentley  
Office of the Governor  
State Capitol  
600 Dexter Avenue  
Montgomery, AL 36130-2751

**ARIZONA**

Gary Pierce  
Chairman  
Arizona Corporation Commission  
Commissioners Wing  
1200 West Washington Street  
Phoenix, AZ 85007-2929

The Honorable Jan Brewer  
Office of the Governor  
1700 West Washington  
Phoenix, AZ 85007

**ARKANSAS**

Colette D. Honorable  
Chairman  
Public Service Commission  
P.O. Box 400  
Little Rock, AR 72203-0400

The Honorable Mark Beebe  
Office of the Governor  
State Capitol, Room 250  
Little Rock, AR 72201

**CALIFORNIA**

Michael R. Peevey  
President  
Public Utilities Commission  
505 Van Ness Avenue  
Room 5218  
San Francisco, CA 94102

The Honorable Edmund Gerald Brown Jr  
Office of the Governor  
State Capitol Building  
Sacramento, CA 95814

**COLORADO**

Joshua Epel  
Chair  
Public Utilities Commission  
1560 Broadway  
Suite 250  
Denver, Co 80202

The Honorable John Hickenlooper  
Office of the Governor  
136 State Capitol  
Denver, CO 80203

**CONNECTICUT**

Arthur H. House  
Chairman  
Public Utility Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

The Honorable Dannel P. Malloy  
Office of the Governor  
State Capitol  
210 Capitol Avenue  
Hartford, CT 06106

**DELAWARE**

Dallas Winslow  
Chair  
Public Service Commission  
Cannon Building  
Suite 100  
861 Silver Lake Boulevard  
Dover, DA 19904

The Honorable Jack Markell  
Office of the Governor  
Tatnall Building  
William Penn Street, 2<sup>nd</sup> Floor  
Dover, DE 19901

**DISTRICT OF COLUMBIA**

Betty Ann Kane  
Chairman  
District of Columbia Public Service Commission  
1333 H Street, NW  
Suite 200, West Tower  
Washington, DC 20005

The Honorable Vincent C. Gray  
Office of the Governor  
John A. Wilson Building  
1350 Pennsylvania Avenue, NW  
Washington, DC 20004

**FLORIDA**

Ronald A. Brise  
Chairman  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

The Honorable Rick Scott  
Office of the Governor  
The Capitol  
400 S. Monroe Street  
Tallahassee, FL 32399

**GEORGIA**

Tim G. Echols  
Chairman  
Public Service Commission  
244 Washington Street, SW  
Atlanta, GA 30334

The Honorable Nathan Deale  
Office of the Governor  
203 State Capitol  
Atlanta, GA 30334

**HAWAII**

Hermira M. Morita  
Chair  
Public Utilities Commission  
465 South King Street  
Room 103  
Honolulu, HI 96813

The Honorable Neil Ambercrombie  
Governor, State of Hawaii  
Executive Chambers  
State Capitol  
Honolulu, HI 96813

**IDAHO**

Paul Kjellander  
President  
Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074

The Honorable C.L. Otter  
Office of the Governor  
P.O. Box 83720  
Boise, ID 83720

**ILLINOIS**

Doug Scott  
Chairman  
Commerce Commission  
527 East Capital Avenue  
Springfield, IL 62701

The Honorable Pat Quinn  
Office of the Governor  
207 State House  
Springfield, IL 62706

**INDIANA**

Jim Atterholt  
Chairman  
Consumer Affairs Division  
302 West Washington Street  
Suite E-306  
Indianapolis, IN 46204

The Honorable Mitch Daniels  
Office of the Governor  
Statehouse  
Indianapolis, IN 46204-2797

**IOWA**

Elizabeth S. Jacobs  
Chair  
Utilities Board  
350 Maple Street  
Des Moines, IA 50319-0069

The Honorable Terry E. Barnstad  
Office of the Governor  
State Capitol  
Des Moines, IA 50319-0001

**KANSAS**

Mark Sievers  
Chairman  
Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

The Honorable Sam Brownback  
Office of the Governor  
State Capitol  
300 SW 10<sup>th</sup> Avenue  
Suite 212S  
Topeka, KS 66612-1590

**KENTUCKY**

David Armstrong  
Chairman  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602

The Honorable Steve Beshear  
Office of the Governor  
700 Capital Avenue, Suite 100  
Frankfort, KY 40601

**LOUISIANA**

Lambert C. Boissiere III  
Commissioner  
Public Service Commission  
Galvez Building  
12<sup>th</sup> Floor  
Public Box 91154  
602 North 5<sup>th</sup> Street  
Baton Rouge, LA 70821

The Honorable Bobby Jindal  
Office of the Governor  
P.O. Box 94004  
Baton Rouge, LA 70804-9004

**MAINE**

Thomas L. Welch  
Chairman  
Public Utilities Commission  
242 State Street  
Augusta, ME 04333-0018

The Honorable Paul LePage  
Office of the Governor  
1 State House Station  
Augusta, ME 04333

**MARYLAND**

Douglas R.M. Nazarian  
Chairman  
Maryland Public Service Commission  
6 St. Paul Street  
16<sup>th</sup> Floor  
Baltimore, MD 21202-6806

The Honorable Martin O'Malley  
Office of the Governor  
State House  
100 State Circle  
Annapolis, MD 21401-1925

**MASSACHUSETTS**

Ann G. Berwick  
Chair  
Department of Telecommunications  
And Cable  
Sharon E. Gillett, Commissioner  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

The Honorable Deval Patrick  
Office of the Governor  
Room 360  
Boston, MA 02133

**MICHIGAN**

John D. Quackenbush  
Chairman  
Public Service Commission  
6545 Mercantile Way  
P.O. Box 30221  
Lansing, MI 48909

The Honorable Rick Synder  
Office of the Governor  
P.O. Box 30013  
Lansing, MI 48909

**MINNESOTA**

Beverly Jones Heydinger  
Chair  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East  
Suite 350  
St. Paul, MN 555101-2147

The Honorable Mark Dayton  
Office of the Governor  
130 State Capitol  
75 Rev. Dr. Martin Luther King, Jr. Blvd.  
St. Paul, MN 55155



**MISSISSIPPI**

Lynn Posey  
Chairman  
Public Service Commission  
Woolfolk Building  
501 N. West Street  
Jackson, MS 39201

The Honorable Phil Bryant  
Office of the Governor  
P.O. Box 139  
Jackson, MS 39205

**MISSOURI**

Kevin D. Gunn  
Chairman  
Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

The Honorable Jay Nixon  
Office of the Governor  
State Capitol Building  
Room 216  
Jefferson City, MO 65101

**MONTANA**

Travis Kavulla  
Chairman  
Public Service Commission  
1701 Prospect Avenue  
P.O. Box 202601  
Helena, MT 59620-2601

The Honorable Brian Schweitzer  
Office of the Governor  
Montana State Capitol Building  
P.O. Box 200801  
Helena, MT 59620-0801

**NEBRASKA**

Rod Johnson  
Chair  
Public Service Commission  
300 The Atrium  
1200 N. Street  
P.O. Box 94927 (68508-4927)  
Lincoln, NE 68509

The Honorable Dave Heineman  
Office of the Governor  
P.O. Box 94848  
Lincoln, NE 68509-4848

**NEVADA**

Alaina C. Burtenshaw  
Chairman, Las Vegas Location  
Public Utilities Commission  
1150 East William Street  
Carson City, NV 89701

The Honorable Brian Sandavol  
Office of the Governor  
State Capitol  
101 North Carson Street  
Carson City, NV 89701

**NEW HAMPSHIRE**

Amy L. Ignatius  
Chairman  
Public Utilities Commission  
21 South Fruit Street  
Suite 10  
Concord, NH 03301-2429

The Honorable John Lynch  
Office of the Governor  
State House  
25 Capitol Street  
Concord, NH 03301

**NEW JERSEY**

Robert M. Hanna  
President  
Board of Public Utilities  
Two Gateway Center  
Newark, NJ 07102

The Honorable Chris Christie  
Office of the Governor  
P.O. Box 001  
Trenton, NJ 08625

**NEW MEXICO**

Patrick H. Lyons  
Chairman - District 2  
Public Regulation Commission  
Consumer Relations Division  
P.O. Drawer 1269  
Santa Fe, NM 87504-1269

The Honorable Susana Martinez  
Office of the Governor  
490 Old Santa Fe Trail  
Room 400  
Santa Fe, NM 87501

**NEW YORK**

Garry A. Brown  
Chairman  
Office of Consumer Service  
3 Empire State Plaza  
Alban, NY 12223-1350

The Honorable Andrew Cuomo  
Office of the Governor  
State Capitol  
Albany, NY 12224

**NORTH CAROLINA**

Edward S. Finley Jr.  
Chairman  
Utilities Commission – Public Staff  
Consumer Services  
4326 Mail Service Center  
Raleigh NC 27699-4326

The Honorable Beverly Purdue  
Office of the Governor  
20301 Mail Service Center  
Raleigh, NC 27699-0301

**NORTH DAKOTA**

Kevin Cramer  
Commissioner  
Public Service Commission  
600 East Boulevard Avenue  
Department 408  
12<sup>th</sup> Floor  
Bismarck, ND 58505-0480

The Honorable Jack Dalrymple  
Office of the Governor  
State Capitol  
600 East Boulevard Avenue  
Bismarck, ND 58505-0001

**OHIO**

Todd Snitchler  
Chairman  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3793

The Honorable John Kasich  
Office of the Governor  
Riffe Center, 30th Floor  
77 South High Street  
Columbus, OH 43215-6108

**OKLAHOMA**

Dana Murphy  
Chair  
Corporation Commission  
P.O. Box 52000  
Oklahoma City, OK 73152-2000

The Honorable Mary Fallen  
Office of the Governor  
State Capitol Building  
2300 N. Lincoln Boulevard  
Room 212  
Oklahoma City, OK 73105

**OREGON**

Susan K. Ackerman  
Chair  
Public Utility Commission  
Consumer Services Division  
550 Capitol Street, NE  
P.O. Box 2148  
Salem, OR 97308-2148

The Honorable John Kitzhaber  
Office of the Governor  
160 State Capitol  
900 Court Street  
Salem, Oregon 97301-4047

**PENNSYLVANIA**

Robert F. Powelson  
Chairman  
Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

The Honorable Tom Corbett  
Office of the Governor  
225 Main Capitol Building  
Harrisburg, PA 17120

**RHODE ISLAND**

Elia Germani  
Chairman  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

The Honorable Lincoln D. Chafee  
Office of the Governor  
222 State House  
Providence, RI 02903-1196

**SOUTH CAROLINA**

John E. Howard  
Chairman  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Suite 100  
Columbia, SC 29210

The Honorable Nikki Haley  
Office of the Governor  
P.O. Box 12267  
Columbia, SC 29211

**SOUTH DAKOTA**

Chris Nelson  
Chairman  
Public Utilities Commission  
Consumer Affairs  
500 East Capitol Avenue  
Pierre, SD 57501-5070

The Honorable Dennis Daugaard  
Office of the Governor  
500 East Capitol Avenue  
Pierre, SD 57501

**TENNESSEE**

Kenneth C. Hill  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

The Honorable Bill Haslam  
Office of the Governor  
Tennessee State Capitol  
Nashville, TN 37243-0001

**TEXAS**

Donna L. Nelson  
Chair  
Public Utilities Commission  
1701 North Congress Avenue  
P.O. Box 13326  
Austin, TX 78711

The Honorable Rick Perry  
Office of the Governor  
P.O. Box 12428  
Austin, TX 78711

**UTAH**

Ted Boyer  
Chairman  
Public Service Commission  
160 East 300 South  
Salt Lake city, UT 84111

The Honorable Gary R. Herbert  
Office of the Governor  
State Capitol Complex  
East Office Building, Suite E-220  
Salt Lake City, UT 84114

**VERMONT**

James Volz  
Chairman  
Public Service Board  
112 State Street  
Drawer 20  
Montpelier, VT 05620-2701

The Honorable Peter Shumlin  
Office of the Governor  
109 State Street, Pavilion  
Montpelier, VT 05609

**VIRGINIA**

Mark C. Christie  
Chairman  
State Corporation Commission  
Division of Communications  
P.O. Box 1197  
Richmond, VA 23218

The Honorable Robert F. McDonnell  
Office of the Governor  
Patrick Henry Building  
1111 East Broad Street  
3<sup>rd</sup> Floor  
Richmond, VA 23219

**VIRGIN ISLANDS**

Donald G. Cole  
Chairman  
Virgin Islands Public Service Commission  
Post Office Box 40  
Charlotte Amalie  
St. Thomas, Virgin Islands 00804

The Honorable John deJongh, Jr.  
Government House, 21-22 Kongens Gade  
Charlotte Amalie  
St. Thomas, VI 00802

**WASHINGTON**

Jeffrey D. Goltz  
Chairman  
Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 4750  
Olympia, WA 98504

The Honorable Christine Gregoire  
Office of the Governor  
P.O. Box 40002  
Olympia, WA 98504-0002

**WEST VIRGINIA**

Michael A. Albert  
Chairman  
West Virginia Public Service Commission  
201 Brooks Street  
Charleston, WV 25301

The Honorable Earl Ray Tomblin  
Office of the Governor  
1900 Kanawha Boulevard E.  
Charleston, WV 25305

**WISCONSIN**

Phil Montgomery  
Chairman  
Consumer Affairs Unit  
610 North Whitney Way  
P.O. Box 7854 (53707-7854)  
Madison, WI 53705

The Honorable Scott Walker  
Office of the Governor  
P.O. Box 7863  
Madison, WI 53707

**WYOMING**

Alan B. Minier  
Chairman  
Public Service Commission  
2515 Warren Avenue  
Suite 300  
Cheyenne, WY 82002

The Honorable Matt Mead  
Office of the Governor  
State Capitol  
200 West 24<sup>th</sup> Street  
Cheyenne, WY 82002

Secretary of Defense  
Attn: Special Asst. for Telecommunications  
Pentagon  
Washington, DC 20301

Mindel De La Torre  
Chief  
International Bureau  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554