

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.**

PUBLIC  
SERVICE COMMISSION

In the Matter of )  
Telefonica Digital, Inc. )  
Section 63.71 Application to Discontinue )  
Domestic Telecommunications Services )

2013 DEC 11 A 10:13

320919

WC Docket No. 13-107

**SECTION 63.71 APPLICATION**

Telefonica Digital, Inc. ("TDI"), in accordance with Section 63.71 of the Commission's rules,<sup>1</sup> hereby requests authority to discontinue the provision of wholesale domestic telecommunications services within the United States.<sup>2</sup>

In support of this application, TDI provides the following information in accordance with Section 63.71(b) of the Commission's rules:

**Name and address of carrier**

Telefonica Digital, Inc.  
200 W. Evelyn Ave., # 120  
Mountain View, CA 94041

**Planned discontinuance date and geographic areas affected**

TDI plans to discontinue its wholesale telecommunications services as of January 1, 2014, or as soon thereafter once the necessary regulatory approvals have been obtained. The affected geographic service area is national.

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<sup>1</sup> 47 C.F.R. § 63.71.

<sup>2</sup> TDI (which in the past operated under the trade name Jajah, Inc.) also will discontinue its provision of wholesale international telecommunications service, and the company today is notifying the International Bureau of the proposed discontinuance under separate cover in accordance with 47 C.F.R. § 63.19. Furthermore, TDI expects to discontinue the provision of all retail domestic and international telecommunications services in the U.S. in early 2014. TDI will be notifying all affected retail customers and expects to file an application with the Commission to discontinue those services after the notification process is complete.

### **Description of affected service**

As relevant to this application, TDI operates as a reseller and wholesale provider of interstate and international transmission capacity. As a general matter, TDI purchases capacity from a range of other carriers and either uses that capacity for its own retail services, uses it in connection with its own information services or those it develops in partnership with others, or resells that capacity to others at wholesale prices. This discontinuance application pertains only to the capacity that TDI resells to others at wholesale prices.

### **Brief description of the dates and methods of notice to all affected customers**

TDI has only 20 wholesale customers. On November 14, 2013, TDI notified each of its 20 affected wholesale customers by e-mail of the proposed discontinuance, using the contact e-mail address each customer maintains with TDI. TDI routinely communicates important service-related information to these customers by e-mail, including documents such as billing statements and similar notices. TDI therefore is confident that each of the 20 wholesale customers received its e-mail notice. Prior to sending its formal discontinuance notice, TDI also discussed the planned discontinuance of wholesale services individually with each of its 20 wholesale customers by telephone or e-mail. TDI also has been taking steps to confirm that each customer received the e-mail containing the formal discontinuance notice, a copy of which is attached to this application as Exhibit A.

In accordance with Section 63.71(a) of the Commission's rules, copies of this application are being submitted to the public utility commission and governor of each affected state and the District of Columbia, as well as to the Special Assistant for Telecommunications to the Secretary of Defense.

### **Carrier's regulatory classification**

TDI is classified as non-dominant with respect to the services at issue in this application.

### **Additional information**

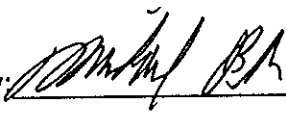
Any questions relating to this application may be directed to undersigned counsel for TDI.

### **Conclusion**

The proposed discontinuance of TDI's wholesale telecommunications services will not adversely affect the public convenience or necessity, as reasonable substitutes for these services are available from numerous competing carriers. TDI therefore respectfully requests that the Commission grant TDI the requested authority to discontinue its provision of the services described herein.

Respectfully submitted,

Telefonica Digital, Inc.

By:  \_\_\_\_\_

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ydori@cov.com  
mbeder@cov.com

*Its Attorneys*

November 15, 2013

Exhibit A

Discontinuance Notice to Wholesale Customers

From: Inbal Dayan <inbal@jajah.com>

Sent: Thu 11/14/2013 3:47 AM

To:

Cc:

Subject: Wholesale services closure

Dear Jajah Wholesale Customer,

Subject to FCC approval, as of January 1, 2014, Jajah will no longer offer any domestic or international wholesale telecommunications services. Feel free to contact your Jajah account manager or our carrier relations manager Gabby Levine if you have any questions or if we can be of help. We have enjoyed working with each of you and appreciate your understanding of this transition.

For those of you based in the United States, the information below is relevant to you.

The FCC will normally authorize this proposed discontinuance of service 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 § 63.71 Application of Telefonica Digital, Inc., d/b/a/ Jajah. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Thank you for having been such a valuable Jajah customer

**Thanks & Best Regards**

**Inbal Dayan | Telefónica Digital**

International Account Manager

Phone: +972-9-9708736

Mobile: +972-54-2279530

Email: [inbal@jajah.com](mailto:inbal@jajah.com)

international wholesale telecommunications services

CERTIFICATE OF SERVICE

I, Joy Barksdale, certify that on this 15th day of November 2013, I caused a copy of the foregoing Section 63.71 application to be served by first-class mail, postage pre-paid upon:

**ALABAMA**

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

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

**ALASKA**

Regulatory Commission of Alaska  
701 W. 8th Avenue  
Suite 30  
Anchorage, AK 99501-3469

The Honorable Sean Parnell  
Office of the Governor  
State Capitol  
P.O. Box 110001  
Juneau, AK 99811-0001

**ARIZONA**

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**

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**

Public Utilities Commission  
505 Van Ness Avenue  
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The Honorable Jerry Brown  
Office of the Governor  
State Capitol Building,  
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Sacramento, CA 95814

**COLORADO**

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**

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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**

Public Service Commission  
Cannon Building  
861 Silver Lake Boulevard  
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The Honorable Jack Markell  
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150 Martin Luther King Jr. Blvd.  
South  
2nd Floor  
Dover, DE 19901

**DISTRICT OF COLUMBIA**

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

The Honorable Vincent C. Gray  
John A. Wilson Building  
1350 Pennsylvania Avenue, NW  
Suite 316  
Washington, DC 20004

**FLORIDA**

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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**GEORGIA**

Public Service Commission  
244 Washington Street, SW  
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The Honorable Nathan Deale  
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203 State Capitol  
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**HAWAII**

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465 South King Street  
Room 103  
Honolulu, HI 96813

The Honorable Neal Ambercrombie  
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State Capitol  
Honolulu, HI 96813

**IDAHO**

Public Utilities Commission  
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**MARYLAND**

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

**MASSACHUSETTS**

Department of Telecommunications  
and Cable  
Geoffrey G. Why, Commissioner  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

The Honorable Deval Patrick  
Massachusetts State House  
Office of the Governor  
Room 280  
Boston, MA 02113

**MICHIGAN**

Public Service Commission  
4300 W. Saginaw Highway  
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**MINNESOTA**

Minnesota Public Utilities Commission  
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75 Rev. Dr. Martin Luther King, Jr.  
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Jefferson City, MO 65102

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**NEVADA**

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Public Utilities Commission  
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The Honorable Maggie Hassan  
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Board of Public Utilities  
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Trenton, NJ 08625

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**NORTH CAROLINA**

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Consumer Services  
4326 Mail Service Center  
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Corporation Commission  
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Consumer Services Department  
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Nashville, TN 37243

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State Capitol  
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Cheyenne, WY 82002

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

A large, stylized handwritten signature in black ink, appearing to read "J. J. Burkhart". The signature is written over a horizontal line.