

FILE



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January 14, 2010  
Via Overnight

Ms. Renee Jenkins, Commission Secretary  
Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street, 13th Floor  
Columbus, Ohio 43215

90-6218-CT-TRF

**RE: Working Assets Funding Service, Inc. d/b/a Credo Long Distance  
Revision to P.U.C.O. Tariff No. 2 (Interexchange)**

Dear Ms. Jenkins:

Enclosed are the original and ten (10) copies of a revision to P.U.C.O. Tariff No. 2 (Interexchange) filed on behalf of Working Assets Funding Service, Inc. d/b/a Credo Long Distance. The Company is a provider of toll services and this filing, made pursuant to discussion with Ms. Cheryl Williams of Staff, is made to remove a detariffed charge from the current tariff. This charge, the Reconnection Fee, is being added to the Company's current Pricing Guide. The Company respectfully requests an effective date of January 15, 2010.

The following tariff pages are included with this filing:

1 <sup>st</sup> Revised Page No. 2	Updates Check Sheet
1 <sup>st</sup> Revised Page No. 21	Removes Reconnection Fee
1 <sup>st</sup> Revised Page No. 23	Removes Reconnection Fee

Please acknowledge receipt of this filing by date stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for this purpose. Any questions you may have regarding this filing may be directed to me at (407) 740-3005 or via email at [mbyrnes@tminc.com](mailto:mbyrnes@tminc.com).

Sincerely,

Monique Byrnes, Consultant to  
Working Assets Funding Service, Inc.  
d/b/a Credo Long Distance

MB/sp

Enclosures

cc: J. Parker – Working Assets  
file: Working Assets – OH  
tns: OH1001

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician Am Date Processed 1/15/10

**The Public Utilities Commission of Ohio**  
**TELECOMMUNICATIONS APPLICATION FORM for ROUTINE PROCEEDINGS**  
(Effective: 01/18/2008)

In the Matter of the Application of Working Assets Funding Service, Inc. d/b/a Credo Long Distance for a Tariff Revision )  
) )  
)

TRF Docket No. 90-\_\_\_\_

Case No. 10 - \_\_\_\_ - **TP** - **TRF**

NOTE: Unless you have reserved a Case # or are filing a Contract, leave the "Case No" fields **BLANK**.

Name of Registrant(s) Working Assets Funding Service, Inc.  
DBA(s) of Registrant(s) Credo Long Distance  
Address of Registrant(s) 101 Market Street, Suite 700, San Francisco, CA 94105  
Company Web Address www.credolongdistance.com  
Regulatory Contact Person(s) Monique Byrnes, Consultant  
Regulatory Contact Person's Email Address mbyrnes@tminc.com  
Contact Person for Annual Report Jean Parker, Assoc. Legal Counsel  
Address (if different from above)  
Consumer Contact Information Jean Parker, Assoc. Legal Counsel  
Address (if different from above)  
Motion for protective order included with filing? ☐ Yes ☒ No  
Motion for waiver(s) filed affecting this case? ☐ Yes ☒ No [Note: Waivers may toll any automatic timeframe.]

Phone 407-740-3005

Fax 407-740-0613

Phone 415-369-2053

Phone 415-369-2053

**Section I – Pursuant to Chapter 4901:11-6 OAC – Part I – Please indicate the Carrier Type and the reason for submitting this form by checking the boxes below. CMRS providers: Please see the bottom of Section II.**

NOTES: (1) For requirements for various applications, see the identified section of Ohio Administrative Code Section 4901 and/or the supplemental application form noted.

(2) Information regarding the number of copies required by the Commission may be obtained from the Commission's web site at [www.puco.ohio.gov](http://www.puco.ohio.gov) under the docketing information system section, by calling the docketing division at 614-466-4095, or by visiting the docketing division at the offices of the Commission.

<b>Carrier Type</b> <input type="checkbox"/> Other (explain below)	<input type="checkbox"/> ILEC	<input type="checkbox"/> CLEC	<input checked="" type="checkbox"/> CTS	<input type="checkbox"/> AOS/IOS
<b>Tier 1 Regulatory Treatment</b>				
Change Rates within approved Range	<input type="checkbox"/> TRF 1-6-04(B) (0 day Notice)	<input type="checkbox"/> TRF 1-6-04(B) (0 day Notice)		
New Service, expanded local calling area, correction of textual error	<input type="checkbox"/> ZTA 1-6-04(B) (0 day Notice)	<input type="checkbox"/> ZTA 1-6-04(B) (0 day Notice)		
Change Terms and Conditions, Introduce non-recurring service charges	<input type="checkbox"/> ATA 1-6-04(B) (Auto 30 days)	<input type="checkbox"/> ATA 1-6-04(B) (Auto 30 days)		
Introduce or Increase Late Payment or Returned Check Charge	<input type="checkbox"/> ATA 1-6-04(B) (Auto 30 days)	<input type="checkbox"/> ATA 1-6-04(B) (Auto 30 days)		
Business Contract	<input type="checkbox"/> CTR 1-6-17 (0 day Notice)	<input type="checkbox"/> CTR 1-6-17 (0 day Notice)		
Withdrawal	<input type="checkbox"/> ATW 1-6-12(A) (Non-Auto)	<input type="checkbox"/> ATW 1-6-12(A) (Auto 30 days)		
Raise the Ceiling of a Rate	Not Applicable	<input type="checkbox"/> SLF 1-6-04(B) (Auto 30 days)		
<b>Tier 2 Regulatory Treatment</b>				
Residential - Introduce non-recurring service charges	<input type="checkbox"/> TRF 1-6-05(E) (0 day Notice)	<input type="checkbox"/> TRF 1-6-05(E) (0 day Notice)		
Residential - Introduce New Tariffed Tier 2 Service(s)	<input type="checkbox"/> TRF 1-6-05(C) (0 day Notice)	<input checked="" type="checkbox"/> TRF 1-6-05(C) (0 day Notice)	<input type="checkbox"/> TRF 1-6-05(C) (0 day Notice)	
Residential - Change Rates, Terms and Conditions, Promotions, or Withdrawal	<input type="checkbox"/> TRF 1-6-05(E) (0 day Notice)	<input type="checkbox"/> TRF 1-6-05(E) (0 day Notice)	<input type="checkbox"/> TRF 1-6-05(E) (0 day Notice)	
Residential - Tier 2 Service Contracts	<input type="checkbox"/> CTR 1-6-17 (0 day Notice)	<input type="checkbox"/> CTR 1-6-17 (0 day Notice)	<input type="checkbox"/> CTR 1-6-17 (0 day Notice)	
Commercial (Business) Contracts	Not Filed	Not Filed	Not Filed	
Business Services (see "Other" below)	Detariffed	Detariffed	Detariffed	
Residential & Business Toll Services (see "Other" below)	Detariffed	Detariffed	Detariffed	

## Section I – Part II – Certificate Status and Procedural

Certificate Status	ILEC	CLEC	CTS	AOS/IOS
Certification (See Supplemental ACE form)		<input type="checkbox"/> ACE 1-6-10 (Auto 30 days)	<input type="checkbox"/> ACE 1-6-10 (Auto 30 days)	<input type="checkbox"/> ACE 1-6-10 (Auto 30 days)
Add Exchanges to Certificate	<input type="checkbox"/> ATA 1-6-09(C) (Auto 30 days)	<input type="checkbox"/> AAC 1-6-10(F) (0 day Notice)	CLECs must attach a current CLEC Exchange Listing Form	
Abandon all Services - With Customers	<input type="checkbox"/> ABN 1-6-11(A) (Non-Auto)	<input type="checkbox"/> ABN 1-6-11(A) (Auto 90 day)	<input type="checkbox"/> ABN 1-6-11(B) (Auto 14 day)	<input type="checkbox"/> ABN 1-6-11(B) (Auto 14 day)
Abandon all Services - Without Customers		<input type="checkbox"/> ABN 1-6-11(A) (Auto 30 days)	<input type="checkbox"/> ABN 1-6-11(B) (Auto 14 day)	<input type="checkbox"/> ABN 1-6-11(B) (Auto 14 day)
Change of Official Name (See below)	<input type="checkbox"/> ACN 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> ACN 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)
Change in Ownership (See below)	<input type="checkbox"/> ACO 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> ACO 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)
Merger (See below)	<input type="checkbox"/> AMT 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> AMT 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)
Transfer a Certificate (See below)	<input type="checkbox"/> ATC 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> ATC 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)
Transaction for transfer or lease of property, plant or business (See below)	<input type="checkbox"/> ATR 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> ATR 1-6-14(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)	<input type="checkbox"/> CIO 1-6-14(A) (0 day Notice)
<b>Procedural</b>				
Designation of Process Agent(s)	<input type="checkbox"/> TRF (0 day Notice)	<input type="checkbox"/> TRF (0 day Notice)	<input type="checkbox"/> TRF (0 day Notice)	<input type="checkbox"/> TRF (0 day Notice)

## Section II – Carrier to Carrier (Pursuant to 4901:1-7), CMRS and Other

Carrier to Carrier	ILEC	CLEC		
Interconnection agreement, or amendment to an approved agreement	<input type="checkbox"/> NAG 1-7-07 (Auto 90 day)	<input type="checkbox"/> NAG 1-7-07 (Auto 90 day)		
Request for Arbitration	<input type="checkbox"/> ARB 1-7-09 (Non-Auto)	<input type="checkbox"/> ARB 1-7-09 (Non-Auto)		
Introduce or change c-t-c service tariffs,	<input type="checkbox"/> ATA 1-7-14 (Auto 30 day)	<input type="checkbox"/> ATA 1-7-14 (Auto 30 day)		
Introduce or change access service pursuant to 07-464-TP-COI	<input type="checkbox"/> ATA (Auto 30 day)			
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC 1-7-04 or 1-7-05 (Non-Auto)	<input type="checkbox"/> UNC 1-7-04 or 1-7-05 (Non-Auto)		
Pole attachment changes in terms and conditions and price changes.	<input type="checkbox"/> UNC 1-7-23(B) (Non-Auto)	<input type="checkbox"/> UNC 1-7-05 (Non-Auto)		
<b>CMRS Providers</b> See 4901:1-6-15	<input type="checkbox"/> RCC [Registration & Change in Operations] (0 day)		<input type="checkbox"/> NAG [Interconnection Agreement or Amendment] (Auto 90 days)	
<b>Other*</b> (explain) Remove detariffed service from tariff.				

\*NOTE: During the interim period between the effective date of the rules and an Applicant's Detariffing Filing, changes to existing business Tier 2 and all toll services, including the addition of new business Tier 2 and all new toll services, will be processed as 0-day TRF filings, and briefly described in the "Other" section above.

All Section I and II applications that result in a change to one or more tariff pages require, at a minimum, the following exhibits. Other exhibits may be required under the applicable rule(s). ACN, ACO, AMT, ATC, ATR and CIO applications see the 4901:1-6-14 Filing Requirements on the Commission's Web Page for a complete list of exhibits.

Exhibit	Description:
A	The tariff pages subject to the proposed change(s) as they exist before the change(s)
B	The Tariff pages subject to the proposed change(s), reflecting the change, with the change(s) marked in the right margin.
C	A short description of the nature of the change(s), the intent of the change(s), and the customers affected.
D	A copy of the notice provided to customers, along with an affidavit that the notice was provided according to the applicable rule(s).

**Section III. – Attestation**

**Registrant hereby attests to its compliance with pertinent entries and orders issued by the Commission.**

**AFFIDAVIT**

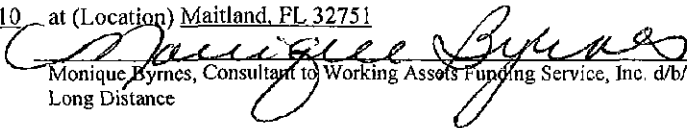
***Compliance with Commission Rules and Service Standards***

I am an officer/agent of the applicant corporation, Working Assets Funding Service, Inc. d/b/a Credo Long Distance, and am authorized to make this statement on its behalf.

I attest that these tariffs comply with all applicable rules, including the Minimum Telephone Service Standards (MTSS) Pursuant to Chapter 4901:1-5 OAC for the state of Ohio. I understand that tariff notification filings do not imply Commission approval and that the Commission's rules, including the Minimum Telephone Service Standards, as modified and clarified from time to time, supersede any contradictory provisions in our tariff. We will fully comply with the rules of the state of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the state of Ohio.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on (Date) January 14, 2010 at (Location) Maitland, FL 32751

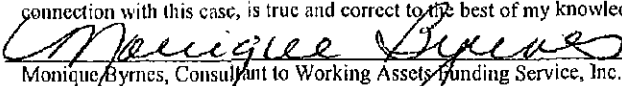
  
Monique Byrnes, Consultant to Working Assets Funding Service, Inc. d/b/a Credo Long Distance

(Date) January 14, 2010

- This affidavit is required for every tariff-affecting filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.

**VERIFICATION**

I, Monique Byrnes, Consultant to Working Assets Funding Service, Inc. d/b/a Credo Long Distance, verify that I have utilized the Telecommunications Application Form for Routine Proceedings provided by the Commission and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct to the best of my knowledge.

  
Monique Byrnes, Consultant to Working Assets Funding Service, Inc. d/b/a Credo Long Distance

(Date) January 14, 2010

...\*Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.

***Send your completed Application Form, including all required attachments as well as the required number of copies, to:***

**Public Utilities Commission of Ohio  
Attention: Docketing Division  
180 East Broad Street, Columbus, OH 43215-3793**

***Or***

***Make such filing electronically as directed in Case No 06-900-AU-WVR***

**EXHIBIT A**

**SUPERCEDED TARIFF PAGES**

Working Assets Funding Service, Inc.  
d/b/a Credo Long Distance  
Stephen Gunn, Vice President of Operations  
101 Market Street, Suite 700  
San Francisco, CA 94105

P.U.C.O. Tariff No. 2  
Original Page No. 2

Issued: April 1, 2008  
Effective: April 1, 2008

### CHECK SHEET

Pages of this Tariff are effective as of the date shown at the bottom of the respective page(s). Original and revised pages as named below comprise all changes from the original Tariff and are currently in effect as of the date on the bottom of this page.

<u>PAGE</u>	<u>REVISION</u>	
1	Original	*
2	Original	*
3	Original	*
4	Original	*
5	Original	*
6	Original	*
7	Original	*
8	Original	*
9	Original	*
10	Original	*
11	Original	*
12	Original	*
13	Original	*
14	Original	*
15	Original	*
16	Original	*
17	Original	*
18	Original	*
19	Original	*
20	Original	*
21	Original	*
22	Original	*
23	Original	*

\*New or revised pages

## SECTION 2 – GENERAL REGULATIONS, (CONT'D.)

### 2.18 Reconnection Fee

Customers whose service has been blocked for non-payment are subject to a reconnection fee as set forth in Section 3 for restoration of service.

### 2.19 Subscriber Responsibilities

The Subscriber is responsible for the payment of charges incurred by any use of the service via the telephone number for which the Subscriber has chosen the Company as the Presubscribed Carrier for local toll and/or long distance calls and for cost of service accessed via the Calling Card number assigned to the Subscriber. The Subscriber is responsible for preventing the unauthorized use of such service, and for the payment of charges incurred by any unauthorized use of the service. Also, the Subscriber is responsible for compliance with this Tariff.

### 2.20 Disconnection Of Services

To cancel service with the Company, the Subscriber must call 1-800-788-0898. However, the Subscriber will continue billing with the Company until the Subscriber's LEC ceases sending the Subscriber's calls to the Company. To ensure calls are no longer sent to the Company by the LEC, the Subscriber must: (1) choose another long distance provider by contacting the Company of Subscriber's choice; or (2) cancel long distance service by contacting the Subscriber's LEC.

### 2.21 Minimum Call Completion Rate

A subscriber can expect a call completion rate of not less than 99.6% during peak use periods for all Feature Group D services (1+ dialing).

Working Assets Funding Service, Inc.  
d/b/a Credo Long Distance  
Stephen Gunn, Vice President of Operations  
101 Market Street, Suite 700  
San Francisco, CA 94105

P.U.C.O. Tariff No. 2  
Original Page No. 23

Issued: April 1, 2008  
Effective: April 1, 2008

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### SECTION 3 – RATES

#### 3.1 Returned Check Charge

If a Customer's check is returned by the bank, the Company may charge the Customer a return check charge. The amount of the return check charge is \$10.00.

#### 3.2 Reconnection Charge

Customers whose service has been blocked for non-payment are subject to a reconnection fee for restoration of service. The charge is \$10.00.

**EXHIBIT B**

**PROPOSED REVISED TARIFF PAGES**

Working Assets Funding Service, Inc.  
d/b/a Credo Long Distance  
Stephen Gunn, Vice President of Operations  
101 Market Street, Suite 700  
San Francisco, CA 94105

P.U.C.O. Tariff No. 2  
1<sup>st</sup> Revised Page No. 2  
Cancels Original Page No. 2  
Issued: January 15, 2010  
Effective: January 15, 2010

### CHECK SHEET

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<u>PAGE</u>	<u>REVISION</u>	
1	Original	
2	1 <sup>st</sup> Revised	*
3	Original	
4	Original	
5	Original	
6	Original	
7	Original	
8	Original	
9	Original	
10	Original	
11	Original	
12	Original	
13	Original	
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15	Original	
16	Original	
17	Original	
18	Original	
19	Original	
20	Original	
21	1 <sup>st</sup> Revised	*
22	Original	
1 <sup>st</sup> Revised	*	

\*New or revised pages

SECTION 2 – GENERAL REGULATIONS, (CONT'D.)

2.18 [Reserved for future use]

(D)  
|  
(D)

2.19 Subscriber Responsibilities

The Subscriber is responsible for the payment of charges incurred by any use of the service via the telephone number for which the Subscriber has chosen the Company as the Presubscribed Carrier for local toll and/or long distance calls and for cost of service accessed via the Calling Card number assigned to the Subscriber. The Subscriber is responsible for preventing the unauthorized use of such service, and for the payment of charges incurred by any unauthorized use of the service. Also, the Subscriber is responsible for compliance with this Tariff.

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Working Assets Funding Service, Inc.  
d/b/a Credo Long Distance  
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P.U.C.O. Tariff No. 2  
1<sup>st</sup> Revised Page No. 23  
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### SECTION 3 – RATES

#### 3.1 Returned Check Charge

If a Customer's check is returned by the bank, the Company may charge the Customer a return check charge. The amount of the return check charge is \$10.00.

(D)  
|  
|  
(D)

**EXHIBIT C**

**DESCRIPTION OF CHANGES**

Remove detariffed charge from the tariff.

**EXHIBIT D**

**CUSTOMER NOTICE  
And  
AFFIDAVIT OF CUSTOMER NOTICE**

**Not Applicable**