

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

In the Matter of)
)
Telefonica Digital, Inc.) WC Docket No. _____
)
Section 63.71 Application to Discontinue)
Domestic Telecommunications Services)

SECTION 63.71 APPLICATION

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

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

¹ 47 C.F.R. § 63.71.

² TDI (which in the past operated under the trade name Jajah, Inc.) also will discontinue its provision of retail 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. TDI previously notified the Commission by its letter of November 15, 2013, of TDI's intent to discontinue international wholesale telecommunications services as of January 1, 2014, and TDI's application to discontinue domestic wholesale telecommunications services as of that date — also filed November 15, 2013 — is pending.

Planned discontinuance date and geographic areas affected

TDI plans to discontinue its retail telecommunications services as of January 31, 2014, or as soon as possible thereafter once the necessary regulatory approvals have been obtained. The affected geographic service area is national.

Description of affected service

As relevant to this application, TDI provides only one consumer-facing retail service, JAJAH.Direct, that is subject to Section 214. JAJAH.Direct enables subscribers to place interstate and international calls over the public switched telephone network ("PSTN") from an ordinary telephone by dialing an access number. That access number, in turn, provides subscribers with access to the JAJAH.Direct platform. From there, subscribers dial their destination number and then input the access code for their account, from which prepaid minutes of use are deducted.

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

On December 1, 2013, TDI notified each affected JAJAH.Direct customer of the proposed discontinuance by e-mail (and sent a follow up e-mail on December 13, 2013), 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. In contrast, TDI never communicates with customers by physical postal mail, nor are customers required to provide a postal address when signing up for TDI's services. TDI therefore does not possess a postal address for the vast majority of its customers, and e-mail is the most reliable and effective way for TDI to distribute its discontinuance notice. A copy of the December 13 follow-up notice is attached to this letter as Exhibit A.

TDI already has taken several additional steps to confirm that each customer is informed of the planned discontinuance. First, all visitors to the JAJAH.Direct website — which is used by customers to manage their accounts — already are greeted by a prominent notice at the top of the page in a red box explaining the discontinuance of service. When expanded, the notice explains additional details about the procedures for obtaining refunds of any remaining credit. The text of this message, which has appeared on the website since December 1, 2013, is attached as Exhibit B. Notably, the notice contains the same Commission-mandated language that is included in the discontinuance notice TDI has transmitted via e-mail to its retail customers. Second, the notice on the website links to detailed FAQs that address at the top the planned discontinuance of JAJAH.Direct.³ These FAQs describe not only the planned discontinuance of JAJAH.Direct, but also explain how, if a customer is carrying a prepaid balance, an automated refund process will be implemented both prior and subsequent to the effective date of the discontinuance. In addition to these existing notification methods, TDI intends to distribute a third notice to all customers via e-mail at least two weeks prior to discontinuing service.

Notably, JAJAH.Direct is not intended to be—and, to TDI’s knowledge, is not—the primary source of telecommunications service for any of its customers. Indeed, the JAJAH.Direct service by definition requires customers to rely on another source of telecommunications service to use the JAJAH.Direct service. This is evident by the fact that JAJAH.Direct customers first must connect to an access number to use the JAJAH.Direct platform, and that access number can be reached only by using a non-JAJAH.Direct

³ See <http://jajah.com/support/faq/>.

telecommunications service. As a consequence, the discontinuance of JAJAH.Direct is not expected to affect any customer's primary telecommunications service.

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:  _____

Yaron Dori
Michael Beder
Covington & Burling LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202.662.6000
Fax: 202.662.6291

ydori@cov.com
mbeder@cov.com

Its Attorneys

December 13, 2013

Exhibit A

Discontinuance Notice to Retail Customers

From: Jajah Support <Jajah_Support@mail.vresp.com>
Sent: Friday, December 13, 2013 10:11 AM
To: Craig Wallace
Subject: Second Reminder Jajah.com Jajah Direct Services are Closing

Dear Jajah Customer,

Second Reminder.

You are receiving this email because you have registered a Jajah.com or Jajah Direct account.

As of January 31, 2014, Jajah will no longer offer any Jajah.com or Jajah Direct services to its users in the United States or elsewhere. This means that, as of January 31, 2014 you will no longer be able to make any calls through Jajah's website or using any Jajah Direct numbers you have set up.

You will be able to continue using your account in the normal way until this date however it is important to note that as of January 31, 2014 it will not be possible to add new funds to your account or make any calls or send SMS.

Users who wish to request a refund now of any balance remaining on their account prior to the service closing may do so by submitting a request at the support page, <http://cts.vresp.com/c/?JAJAH/f688b5760c/ccc3f34809/e6d8175b77>. After requesting a refund, your account will be closed and refund processed within 30 days.

If you do not receive a refund you may contact Jajah at JajahVoice@jajah.com no later than January 31, 2014 and, if necessary, you may be asked to provide PayPal account information to which Jajah can post the credit. Jajah will not be responsible for providing refunds except as provided above and under the terms set forth at <http://cts.vresp.com/c/?JAJAH/f688b5760c/ccc3f34809/f0436d4e16>. If you do not apply for a refund, Jajah intends to issue your refund automatically once the service closes. If Jajah is unable to issue your refund automatically, it will attempt to contact you.

Thank you for having been such a valuable Jajah.com user.

Jajah
200 West Evelyn Ave,
Suite 120,
Mountain View,
CA 94041,

USA

Note Regarding FCC Application to Discontinue Domestic Service

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.

Click to view this email in a browser

<http://hosted.verticalresponse.com/712604/f688b5760c/1501783373/ccc3f34809/>

If you no longer wish to receive these emails, please reply to this message with "Unsubscribe" in the subject line or simply click on the following link:

<http://cts.vresp.com/u?f688b5760c/ccc3f34809/mlpftw>

This message was sent by Jajah Support using VerticalResponse

JAJAH
200 West Evelyn Ave, Suite 120
Mountain View, California 94041
US

Read the VerticalResponse marketing policy:
http://www.verticalresponse.com/content/pm_policy.html

Exhibit B

Discontinuance Message on Website

Service closure - As of January 31, 2014, Jajah will no longer offer its services.

This means that, as of January 31, 2014, you will no longer be able to make any calls through any of Jajah's services, including the Jajah.com website and Jajah Direct. Registration of new accounts are no longer being accepted.

You will be able to continue using your account in the normal way until this date.

Users who wish to apply for a refund of any balance remaining on their account prior to the service closing may do so by submitting a request at the support page, <http://www.jajah.com/support/contact>

After requesting a refund, your request will be processed and account closed within 30 days.

For more details please review FAQs at <http://www.jajah.com/support/faq/>

Jajah 200 West Evelyn Ave, Suite 120 Mountain View, CA 94041 USA

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CERTIFICATE OF SERVICE

I, Joy Barksdale, certify that on this 13th day of December 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
Room 5218
San Francisco, CA 94102

The Honorable Jerry Brown
Office of the Governor
State Capitol Building,
Suite 1173
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

Department of Public Utility Control
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
Suite 100
Dover, DE 19904

The Honorable Jack Markell
Office of the Governor
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
Tallahassee, FL 32399-0850

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

GEORGIA

Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-9052

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

HAWAII

Public Utilities Commission
465 South King Street
Room 103
Honolulu, HI 96813

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

IDAHO

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

Commerce Commission
527 East Capital Avenue
Springfield, IL 62701

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

INDIANA

Consumer Affairs Division
302 West Washington Street
Room E-306
Indianapolis, IN 46204

The Honorable Mike Pence
Office of the Governor
Statehouse
Indianapolis, IN 46204-2797

IOWA

Utilities Board
1375 E. Court Avenue, Room 69
Des Moines, IL 50319-0069

The Honorable Terry E. Branstad
Office of the Governor
1007 East Grand Avenue
Des Moines, IA 50319

KANSAS

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

The Honorable Sam Brownback
Office of the Governor
State Capitol
300 SW 10th Avenue
Suite 241S
Topeka, KS 66612-1590

KENTUCKY

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

Public Service Commission
Galvez Building 12th Floor
602 North Fifth Street
Post Office Box 91154
Baton Rouge, Louisiana 70821-9154

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

MAINE

Public Utilities Commission
18 State House Station
Augusta, ME 04333-0018

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

MARYLAND

Maryland Public Service Commission
6 St. Paul Street
16th floor
Baltimore, MD 21202

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
P.O. Box 30221
Lansing, MI 48909

The Honorable Rick Synder
Office of the Governor
P.O. Box 30013
Lansing, MI 48908

MINNESOTA

Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

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

MISSISSIPPI

Public Service Commission
Woolfolk Building
501 N. West Street, Suite 201A
Jackson, MS 39201

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

MISSOURI

Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102

The Honorable Jay Nixon
Office of the Governor
P.O. Box 720
Jefferson City, MO 65102

MONTANA

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

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

NEBRASKA

Public Service Commission
1200 N. Street, Suite 300
Lincoln, NE 68508

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

NEVADA

Public Utilities Commission
1150 East William Street
Carson City, NV 89701

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

NEW HAMPSHIRE

Public Utilities Commission
21 South Fruit Street
Suite 10
Concord, NH 03301-2429

The Honorable Maggie
Hassan Office of the
Governor State House
107 North Main Street Concord, NH 03301

NEW JERSEY

Board of Public Utilities
44 S. Clinton Avenue
9th floor
PO Box 350
Trenton, NJ 08625

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

NEW MEXICO

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

New York Public Services Commission
Office of Consumer Services
3 Empire State Plaza
Alban. NY 12223-1350

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

NORTH CAROLINA

Utilities Commission - Public Staff
Consumer Services
4326 Mail Service Center
Raleigh NC 27699-4326

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

NORTH DAKOTA

Public Service Commission
600 East Boulevard Avenue
Department 408
Bismarck, ND 58505-0480

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

OHIO

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

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

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

OREGON

Public Utility Commission
Consumer Services Division
P.O. Box 1088
Salem, OR 97308-1088

The Honorable Jolm Kitzhaber
Office of the Governor
State Capitol Building
900 Court Street NE, 160
Salem, Oregon 97301

PENNSYLVANIA

Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

The Honorable Tom Corbett
Office of the Governor
508 E Floor Main Capitol Building
Harrisburg, PA 17120

RHODE ISLAND

Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

The Honorable Lincoln D. Chaffee
Office of the Governor
82 Smith State
Providence, RI 02903

SOUTH CAROLINA

Department of Consumer Affairs
Consumer Services Department
PO Box 5757
Columbia, SC 29250

The Honorable Nikki Haley
Office of the Governor
1205 Pendleton Street
Columbia, SC 29211

SOUTH DAKOTA

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

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

TENNESSEE

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

The Honorable Bill Haslam
Office of the Governor 1st
Floor, State Capitol
Nashville, TN 37243

TEXAS

Public Utility 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 78711-2428

UTAH

Public Service Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84114

The Honorable Gary R. Herbert
Office of the Governor
State Capitol Complex
350 North State Street, Suite 200
PO Box 142220
Salt Lake City, UT 84114

VERMONT

Public Service Board
112 State Street
Montpelier, VT 05620-2701

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

VIRGINIA

State Corporation Commission
Division of Communications
P.O. Box 1197
Richmond, VA 23218

The Honorable Robert McDonnell
Office of the Governor
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, VA 23219

WASHINGTON

Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

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

WEST VIRGINIA

West Virginia Public Service
Commission
201 Brooks Street
Charleston, WV 25301

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

WISCONSIN

Wisconsin DATCP
Consumer Affairs Unit
2811 Agriculture Drive
P.O. Box 8911
Madison, WI 53708-

The Honorable Scott Walker
Office of the Governor
115 East Capitol
Madison, WI 53702

WYOMING

Public Service Commission
2515 Warren Avenue
Suite 300
Cheyenne, WY 82002

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

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

A handwritten signature in cursive script, appearing to read "Earl Ray Tomblin", is written over a horizontal line.