



ANDREW O. ISAR

4423 POINT FOSDICK DRIVE, NW
SUITE 306
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 866.474.3630
WWW.MILLERISAR.COM

Via International Bureau Filing System

October 27, 2010

Mr. James Ball
Chief Policy Division, International Bureau
Federal Communications Commission
445 12th Street, SW
Room 7-A760
Washington, D.C. 20554

RE: Transcard, LLC f/k/a Innovative Processing Solutions, LLC Notice of Discontinuance of International Service, ITC-214-20050314-00103

Dear Mr. Ball:

Transcard, LLC f/k/a Innovative Processing Solutions, LLC (“Transcard” or “Company”), by its regulatory consultants and pursuant to Section 63.19 of the Commission’s rules,¹ hereby provides the International Bureau with notice of Transcard’s intent to discontinue the provision of international services, effective January 31, 2011.

On April 1, 2005, Transcard was granted Global or Limited Global Facilities-Based Service, Global or Limited Global Resale Service international authority under section 214 of the Communications Act of 1934, as amended.^{2 3} Transcard has served *inter alia* as a non-dominant provider of prepaid calling card services to the logistics industry. Although the Company’s telecommunications service is used almost exclusively to place domestic interstate calls, the potential for placement of international calls prompted the Company to seek and maintain international operating authority.

Transcard’s request for discontinuance of its international authority stems from an affirmative business decision to cease providing its resold discretionary prepaid telecommunications services.⁴ Transcard currently serves less than 500 remaining active card user accounts, and has made arrangements for remaining customers to continue receiving service until customers’

¹ 47 C.F.R. §63.19.

² Codified at 47 U.S.C. §214.

³ ITC-214-20050314-00103 (granted under the Company’s former name Innovative Processing Solutions, LLC).

⁴ Separate application to discontinue domestic interstate telecommunications services pursuant to Section 63.71 of the Commission’s rules has been filed contemporaneously with this Notice.

Mr. James Ball
October 26, 2010
Page 2

prepaid calling account balances have been depleted or upon the one year anniversary of account activation, whichever occurs first. The one year anniversary of the last card sold will be January 31, 2011, the date on which the Company will terminate its telecommunications services.

Transcard has provided a discretionary prepaid calling card service that supplements, but does not replace, conventional presubscribed, post-paid telecommunications services. As a matter of convention and practical consideration, no written notification of service discontinuance is – or can be -- provided to users when prepaid calling card accounts are depleted, as would otherwise be possible for post-paid, presubscribed telecommunications services, because the Company does not know the identity of its card users.⁵

Moreover, Customer identity is unknown. The Company provides prepaid service cards, which include access to telecommunications services to logistics industry customers. Such Customers exclusively comprise trucking companies. Customers then distribute the cards to their drivers, other employees and to contract drivers. The identity of the user is unavailable to the Company, accordingly.

Further, prepaid calling card services are inherently a discretionary. Such services supplement, but do not replace, post-paid presubscribed telecommunications services. Transcard Customers and their users readily understand that prepaid calling card services are strictly temporary in nature, usable so long as funds remain in user prepaid calling accounts or upon the first year anniversary of account activation. Customers and their users clearly recognize that once a prepaid card account is depleted or after a year of account activation, service access is no longer available. Once account funds are depleted or upon the first year anniversary of account activation, network access is terminated, as opposed to service being “discontinued” in a conventional sense. As such, written notice of service discontinuance is not provided as it would for ongoing post-paid presubscribed services.

Transcard services have been provided to a very limited, targeted segment of telecommunications users through card distribution arrangements with logistics companies that supply cards to their drivers. Only one such logistic customer remains.⁶ Transcard does not sell, nor has it sold, its discretionary prepaid calling card services through retail outlets. In anticipation of discontinuing the provision of its service, Transcard has allowed users to deplete their prepaid calling card accounts through normal usage. Users have not had the option of renewing accounts, *e.g.* prepaying for additional time. When a user’s prepaid account becomes depleted, the subscriber is no longer capable of placing calls utilizing Transcard’s services,

⁵ 47 C.F.R. §63.19(a)(1). Users have been informed of the Company’s termination policies at the point of distribution by the Company’s logistics company customers.

⁶ The Company has provided written notification of its intent to terminate services to its sole remaining logistics company customer, U.S. Xpress Enterprises, Inc., whose drivers received the last of the Company’s prepaid calling cards. A copy of this notice is attached.

Mr. James Ball
October 26, 2010
Page 3

accordingly. Additionally, user accounts are deactivated and network access no longer is made available to users on the one year anniversary of account activation. Users are informed that the service remains available through the shorter of account depletion or one year account activation anniversary at the time of purchase and account activation.

Notwithstanding the foregoing, remaining users will continue to receive recorded notice of how much remains in their prepaid account when accessing the Company's services and entering the account identification number. Users will further continue to be informed when their accounts are about to become depleted and will be notified by Transcard's customer service if contacting the Company.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in cursive script that reads "Andrew O. Isar". The signature is written in black ink and is positioned below the printed name of the sender.

Andrew O. Isar

Regulatory Consultants to
Transcard, LLC f/k/a Innovative Processing Solutions, LLC



October 18, 2010

U.S.Xpress Enterprises, Inc.
4080 Jenkins Road
Chattanooga, TN 37421
Ray Harlin

RE: PhoneCard Service Discontinued

Dear Mr. Harlin:

TransCard, formerly TransCommunications, has a long standing relationship providing Prepaid PhoneCard services to U.S.Xpress.

As all technology eventually becomes obsolete, we find that our PhoneCard service is no exception. Now that cell phones, with free long distance services, have become ubiquitous, TransCard has decided to discontinue the service as of January 31st, 2011.

We have considered many different strategies to change the PhoneCard product to enable us to continue to deliver value and services to you our client. Unfortunately the economics of the service will not support its continuance.

As noted in our initial December 2009 notice, TransCard will not accept any further reloads of cards after December 15th, 2009. Cardholders will be able to continue using the service to redeem any unexpired minutes until January 31st, at which time TransCard will discontinue the service altogether.

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 objections 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 (carrier's name). 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.

We want to thank you for your patronage over the years and look forward to many more serving your Fuel and Payroll Card needs.

Regards,

Craig Fuller
CEO

Cc: Ryan Rogers