



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

August 13, 2025

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement v.
Working Assets Funding Service
Docket No. C-2025-
I&E Formal Complaint (USF)

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement's (I&E) **Formal Complaint** for the above-captioned proceeding.

Copies are being served on all parties of record as evidenced in the attached Certificate of Service. Should you have any questions, or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Rosul', is written over a light blue horizontal line.

Grant Rosul
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 318204
(717) 783-5243
grosul@pa.gov

cc: Michael L. Swindler, Deputy Chief Prosecutor, I&E-Enforcement (*via email*)
As per Certificate of Service

NOTICE

A. You must file an Answer within 20 days of the date of service of this Complaint.

The date of service is the mailing date as indicated at the top of the Secretarial Letter. *See* 52 Pa. Code § 1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Or, you may eFile your Answer using the Commission’s website at www.puc.pa.gov. The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary’s Bureau.

In Addition to filing your Answer with the Commission’s Secretary, please electronically serve a copy on:

Grant Rosul, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 3rd Floor West
Harrisburg, PA 17120

Or, emailed to Mr. Rosul at: grosul@pa.gov

B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief.

C. You may elect not to contest this Complaint by paying the past due PaUSF Assessment, late fees, and civil penalty within 20 days.

Payment of the PaUSF assessment and late fees should be made payable to the “PA Universal Service Fund” with your account number indicated. Payments must be submitted directly to M&T Bank, either via US Postal Service, overnight delivery or electronically via ACH/EFT. For payments via US Postal Service, please send to:

Commonwealth of Pennsylvania – Public Utility Commission
P.O. Box 69479
Baltimore, Maryland 21264-9479

For payments via overnight delivery, please send to:

M&T Bank
c/o Commonwealth of Pennsylvania – Public Utility Commission
Box #69479
1800 Washington Blvd. 8th Floor
Baltimore, Maryland 21230

If you wish to pay via electronic payment, please contact Rolka directly at pausf@rolkaloube.com.

Payment of the civil penalty must be made by certified check or money order, made payable to the “Commonwealth of Pennsylvania,” with the docket number indicated, and mailed to:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400North Street
Harrisburg, PA 17120

D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the requested relief set forth in this Complaint.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

G. Alternative formats of this material are available for persons with disabilities by contacting the Commission’s ADA Coordinator at (717) 787-8714.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2025-
	:	
Working Assets Funding Service	:	

FORMAL COMPLAINT

NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by its prosecuting attorney, and files this **Universal Service Fund Complaint** against Working Assets Funding Service (“Respondent”), pursuant to Section 701 of the Public Utility Code (“Code”), 66 Pa.C.S. § 701, alleging violations of the Commission’s regulations. In support of its Complaint, I&E respectfully represents the following:

I. PARTIES AND JURISDICTION

1. The Pennsylvania Public Utility Commission, with a mailing address of Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, *et seq.*

2. Complainant is the Commission’s Bureau of Investigation and Enforcement and is the entity established by statute to prosecute complaints against public utilities pursuant to 66 Pa.C.S. § 308.2(a)(11). *See also Implementation of Act 129 of 2008; Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Order entered August 11, 2011) at 5 (transferring authority to prosecute assessment cases to I&E).

3. Complainant is represented by:

Grant Rosul, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 783-5243
grosul@pa.gov

4. Respondent is Working Assets Funding Service., whose mailing address is 3609 Austin Bluffs Parkway, Suite 31-1201, Colorado Springs, CO 80918-6658, Attn: Nathanael Bryant.

5. Respondent is a “public utility” as that term is defined at 66 Pa.C.S. § 102, as it is engaged in offering, rendering, furnishing, or supplying telecommunications services as a competitive local exchange carrier for the public in the Commonwealth of Pennsylvania for compensation.

6. The Commission issued Respondent a Certificate of Public Convenience on or about August 19, 1992, at A-310064, for Interexchange Carrier Reseller authority.

7. Section 501(a) of the Public Utility Code, authorizes and obligates the Commission to execute and enforce the provisions of the Code. 66 Pa.C.S. § 501(a).

8. Section 701 of the Code authorizes the Commission to, *inter alia*, hear and determine complaints against public utilities for a violation of any law or regulation that the Commission has jurisdiction to administer.

9. Section 63.171 of the Commission’s regulations, 52 Pa. Code § 63.171, authorizes the Commission to initiate enforcement actions against telecommunications service providers that fail to pay, in a timely manner, any contributions required under the Commission’s Universal Service regulations.

10. Section 3301 of the Code, 66 Pa.C.S. § 3301, authorizes the Commission to impose civil penalties on any public utility, or any other person or corporation subject to the Commission’s authority, for violation(s) of the Public Utility Code and/or Commission regulations. Section 3301(a)-(b) of the Code, 66 Pa.C.S. § 3301(a)-(b), allows for the imposition of a separate civil penalty for each violation and each day’s continuance of such violation(s).

11. Respondent, in providing service as an Interexchange Reseller to the public in the Commonwealth, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Public Utility Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations.

12. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this complaint and the actions of Respondent related thereto.

II. FACTUAL BACKGROUND

13. Section 3011 of the Code, 66 Pa.C.S. § 3011, authorizes the Commission to establish a Universal Service Fund (“PaUSF” or “USF”) to ensure the availability of basic telecommunications services to all Pennsylvania residents.

14. The Universal Service Fund Regulations were established at Sections 63.161 to 63.171 of the Commission’s regulations, 52 Pa. Code §§ 63.161- 63.171.

2025 CALENDAR YEAR

15. Pursuant to 52 Pa. Code § 63.164, the Commission established the size of the PaUSF and the assessment rate for contributing telecommunications providers¹ for the 2025 calendar year. *Pennsylvania Universal Service Fund Annual Rate Adjustment*, Docket No. M-

¹ Contributing telecommunications providers are telecommunications carriers that provide intrastate telecommunications services. See 52 Pa. Code § 63.162.

00001337 (Order entered December 5, 2024).

16. Respondent is a contributing telecommunications provider.

17. The Commission's third-party USF administrator, Rolka Loube Saltzer, LLC ("Rolka") determined that Respondent's monthly contribution to the PaUSF for the 2025 calendar year would be \$25.53. Therefore, Rolka mailed to Respondent an invoice every month in 2025 for the amount of \$25.53. Payments were due by the 15th of every month.

18. Respondent has not paid any of its PaUSF assessment invoices in 2025.

19. In addition, Respondent has an outstanding balance of \$78.13 from prior years.

20. To date, Respondent has not submitted payment regarding its outstanding PaUSF assessment balance for the 2025 calendar year.

21. On July 17, 2025, Rolka sent Respondent a letter requesting payment of its past due PaUSF assessment balance and associated late fees. *See* I&E Exhibit 1.

22. Respondent was assessed \$15.59 in late fees for the unpaid PaUSF assessments through January 1, 2025 to July 15, 2025.² *Id.*

23. As of July 31, 2025, Respondent's outstanding PAUSF assessment balance is \$254.74. *Id.*

24. As of July 31, 2025, Respondent's outstanding PaUSF balance, which includes Respondent's assessment balance and associated late fees, is \$270.33. *Id.*

III. VIOLATIONS

Count 1

25. Respondent failed to satisfy its PaUSF assessments for the 2025 calendar year in full. If proven, this is a violation of Section 63.169(a) of the Commission's regulations, 52 Pa.

² Failure to make timely payment will result in the levy of a late payment charge of 1.5% per month pro rata per diem on the delinquent contribution. *See* 52 Pa. Code § 63.169(b).

Code § 63.169(a). The Bureau of Investigation and Enforcement’s proposed civil penalty is \$64.³ This civil penalty, consistent with past Commission decisions,⁴ is based on the following factors: (1) the type of violation involved; (2) the assessment amount in question; and (3) Respondent’s compliance history with the Public Utility Code and Commission’s regulations for three (3) years prior to the filing of this Complaint.⁵

WHEREFORE, for all the foregoing reasons, the Pennsylvania Public Utility Commission’s Bureau of Investigation and Enforcement respectfully requests that:

- (a) Respondent be ordered to pay a total of \$334.33, which consists of Respondent’s outstanding PaUSF assessment balance of \$254.74, associated late fees of \$15.59, and a total civil penalty of \$64 for the above-described violations.

Payment of the **PaUSF assessment and late fees totaling \$270.33** should be made payable to the “PA Universal Service Fund” with the Respondent’s account number indicated. Payments must be submitted directly to M&T Bank, either via US Postal Service, overnight delivery or electronically via ACH/EFT. For payments via US Postal Service, please send to:

Commonwealth of Pennsylvania – Public Utility Commission
P.O. Box 69479
Baltimore, Maryland 21264-9479

For payments via overnight delivery, please send to:

M&T Bank
c/o Commonwealth of Pennsylvania – Public Utility Commission
Box #69479
1800 Washington Blvd. 8th Floor
Baltimore, Maryland 21230

³ I&E anticipates that this level of penalty will provide a sufficient deterrent against future violations by Respondent.

⁴ *See Pa. Pub. Util. Comm’n v. Moore Family Holdings, LLC*, Docket No. C-2021-3029489 (Order entered April 14, 2022); *Pa. Pub. Util. Comm’n v. Safety 1st Paratransit Inc.*, Docket No. C-2021-3029522 (Order entered April 14, 2022); *Pa. Pub. Util. Comm’n v. JB Jr. Trucking LLC*, Docket No. C-2021-3029458 (Order entered February 24, 2022).

⁵ A review of the Commission’s records for a period of three (3) years prior to the date of the filing of this Complaint demonstrates that Respondent does not have an acceptable compliance history with the Commission.

If you wish to pay via electronic payment, please contact Rolka directly at pausf@rolkaloube.com.

Payment of the **civil penalty totaling \$64** should be made by certified check or money order, made payable to the “Commonwealth of Pennsylvania” with the docket number of this proceeding listed on the check, and mailed to the Secretary’s Bureau of the Commission; and

- (b) If payment of the assessment and civil penalty is not made, the Bureau of Investigation and Enforcement requests that:
1. The Commission issue an Order to cancel the Certificate of Public Convenience issued to Respondent; and
 2. The matter be referred to the Pennsylvania Office of Attorney General for appropriate action.

Respectfully submitted,



Grant Rosul
Prosecutor
PA Attorney ID No. 318204

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 783-5243
grosul@pa.gov

Date: August 13, 2025

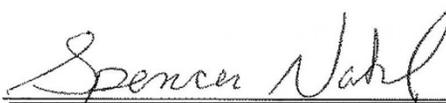
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2025-
	:	
Working Assets Funding Service	:	

VERIFICATION

I, Spencer Nahf, Fixed Utility Financial Analyst, Bureau of Technical Utility Services, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect the Bureau will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: August 13, 2025



Spencer Nahf, Fixed Utility Financial Analyst
Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

EXHIBIT 1



Rolka Loube Associates, LLC
4050 Crum's Mill Road
Suite 303
Harrisburg PA 17112

Statement

7/16/2025

Billing Address

Working Assets Funding Services
3609 Austin Bluffs Parkway Suite 31-1201
Colorado Springs CO 80918

PA USF #: **310064**

				Amount Due
				\$270.33

Date	Description	Debit	Credit	Balance
1/1/2025	Balance Forward			\$78.13
1/1/2025	Invoice #INV74266	\$25.23		\$103.36
1/15/2025	Finance Charge #INV75471	\$1.50		\$104.86
2/1/2025	Invoice #INV75953	\$25.23		\$130.09
2/15/2025	Finance Charge #INV76762	\$1.53		\$131.62
3/1/2025	Invoice #INV77114	\$25.23		\$156.85
3/15/2025	Finance Charge #INV78323	\$1.50		\$158.35
4/1/2025	Invoice #INV78749	\$25.23		\$183.58
4/15/2025	Finance Charge #INV79479	\$2.31		\$185.89
5/1/2025	Invoice #INV80089	\$25.23		\$211.12
5/15/2025	Finance Charge #INV81346	\$2.69		\$213.81
6/1/2025	Invoice #INV81795	\$25.23		\$239.04
6/16/2025	Finance Charge #INV83024	\$3.18		\$242.22
7/1/2025	Invoice #INV83485	\$25.23		\$267.45
7/15/2025	Finance Charge #INV84325	\$2.88		\$270.33

Current	1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Amount Due
\$0.00	\$31.29	\$25.23	\$27.92	\$185.89	\$270.33

Remittance Must be received by
"M & T Bank"
Payable to "PA Universal Service Fund"

Direct questions to PAUSF Manager
Rolka Loube, LLC
Phone (877) 206-9343 or PAUSF@Rolkaloube.com

If your company has a credit-balance-please apply credit against next remittance

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
Bureau of Investigation and Enforcement :
v. : Docket No. C-2025-
Working Assets Funding Service :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Formal Complaint** in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by party):

Service by Certified Mail and Electronic Mail

Working Assets Funding Service
Attn: Nathanael Bryant
3609 Austin Bluffs Parkway,
Suite 31-1201,
Colorado Springs, CO 80918-6658
nbryant@workingassets.com

Working Assets Funding Service
Attn: Ruth Betsy
151 Southhall Lane,
Suite 450
Maitland, FL 32751
rbetsy@inteserra.com



Grant Rosul
Prosecutor
PA Attorney ID No. 318204

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Bureau of Investigation and Enforcement
Commonwealth Keystone Building
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