



Federal Communications Commission  
Washington, D.C. 20554

August 23, 2012

Ms. Patricia Paoletta  
Counsel to Rubard LLC, d/b/a Centmobile  
Wiltshire & Grammis, LLP  
1200 18<sup>th</sup> Street, NW  
Suite 1200  
Washington, DC 20036

FEB 19 2013  
Policy Division  
International Bureau

Re: Rubard LLC, d/b/a Centmobile  
ITC-214-20120518-00134  
ITC-STA-20120703-00168

Ms. Paoletta:

This letter is in response to your request for Special Temporary Authority (STA) filed on behalf of Rubard LLC, d/b/a Centmobile (Centmobile) in regard to its pending international section 214 application. In the application, Centmobile requests authority to provide international facilities-based and resale services, pursuant to the Commission's rules.<sup>1</sup> Stanacard LLC (Stanacard) opposes grant of both the 214 application and the STA request.<sup>2</sup>

Centmobile is now providing services for which it seeks authority to provide in its application.<sup>3</sup> It seeks an STA in order to continue services to existing customers under their prepaid plans during the pendency of its application. Stanacard opposes the request, arguing that it has established a *prima facie* case that Centmobile's underlying application must be denied and that Centmobile has not established a public interest basis for grant of an STA.<sup>4</sup> While we view Centmobile's actions and Stanacard's allegations as serious and meriting careful consideration, we will not determine, in the context of acting on this STA, whether Stanacard has made a *prima facie* case that Centmobile's international section 214 application should be denied. By this letter, we grant in part Centmobile's request for a limited STA subject to conditions for the purpose of permitting it to temporarily continue the provision of resale services during the pendency of its application.

---

<sup>1</sup> 47 U.S.C. § 214; 47 C.F.R. § 63.18.

<sup>2</sup> Stanacard *Petition to Deny International Section 214 Application of Rubard LLC d/b/a Centmobile*, File No. ITC-214-20120518-00134, filed June 20, 2012; *Reply to Opposition to Petition to Deny International Section 214 Application of Centmobile*, filed July 12, 2012; *Opposition to Application for STA of Centmobile*, File No. ITC-STA-20120703-00168, filed July 9, 2012; and *Reply to Response to Opposition to Application for STA of Centmobile*, filed July 16, 2012.


<sup>3</sup> Stanacard informed the Commission that Centmobile had been providing service prior to filing its application. See Stanacard *Petition to Deny* at 8-9. Centmobile subsequently acknowledged that it has been providing resale service. See Letters from Patricia Paoletta, Counsel to Centmobile, dated July 3, 2012, July 11, 2012, and July 13, 2012.

<sup>4</sup> *Opposition to Application for STA of Centmobile*, filed July 9, 2012; and Stanacard's *Reply to Response to Opposition to Application for STA of Centmobile*, filed July 16, 2012.

Federal Communications Commission

We authorize Centmobile, for a period of 180 days, to expire on February 19, 2013, to provide international resale services provided that Centmobile complies with all applicable Commission rules in providing such international resale services. As acknowledged by Centmobile,<sup>5</sup> (1) the grant of this STA does not prejudice any action the Commission may take on Centmobile's underlying application, or any other action that it may take as a result of Centmobile's provision of service prior to obtaining authority to do so, and (2) this STA may be revoked or discontinued by the Commission, at any time and on its own motion, without a hearing.

Sincerely,

  
James L. Ball  
Chief, Policy Division,  
International Bureau

Cc:  
Mr. Cheng-Yi Liu  
Counsel to Stanacard, LLC  
Law Offices of Thomas K. Crowe, P.C.  
Suite 300  
1250 24<sup>th</sup> Street, N.W.  
Washington, D.C. 20037

---

<sup>5</sup> See Letter from Patricia Paoletta, Counsel to Centmobile, dated July 13, 2012, at 2.

Streamlined

ITC-STA-20130128-00025  
IB2013000250

**Granted**  
FEB 19 2013

Rubard LLC d/b/a Centmobile

*Re: ITC-214-20120518-00134*

**date:** Expiring Aug. 19, 2013  
Policy Division  
International Bureau

**authorized by:** *Chief, Policy Div. IB*

*James L. Ball*  
nature

**WGS & GRANNIS LLP**

Mr. James Ball  
Chief, Policy Division  
International Bureau  
Federal Communications Bureau  
445 12<sup>th</sup> St SW  
Washington, D.C. 20554

*Extension of STA to continue to provide international resale services subject to the conditions set forth in the August 23, 2012 letter granting ITC-STA-20120903-00168*

Attachment 3

Re: FCC Form 214STA ITC-STA-20120703-00168 and ITC-214-20120518-00134

Dear Mr. Ball:

This letter serves as Attachment 3 to the renewed Special Temporary Authority ("STA") application of Rubard LLC d/b/a Centmobile ("Centmobile") filed January 28, 2013 to extend the date of Centmobile's existing STA. On August 23, 2012, your office granted an STA to Centmobile to provide resale authority for 180 days. This grant expires on February 19, 2013.

As of the writing of this letter, Centmobile still waits for a determination on the above-referenced 214 application for global facilities-based and resale authority, which was removed from streamlined processing June 22, 2012. To ensure that Centmobile can continue to provide service to its prepaid customers while it awaits this determination, Centmobile seeks an extension of its STA to provide resold international telecommunications services.

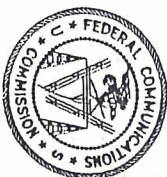
Centmobile recognizes that providing international services prior to express authorization by the Commission is not permitted by its rules. Centmobile seeks expeditious treatment of its STA in order to continue to provide affordable international calling services during the pendency of Commission review of the above referenced 214 application. Centmobile acknowledges that grant of renewed STA for an additional six months is without prejudice to Commission action on the underlying 214 application and that the Commission may revoke or modify a renewed STA upon its own motion without a hearing.

Respectfully submitted,

*Patricia Paoletta*

Patricia Paoletta  
Counsel to Rubard LLC, dba Centmobile

cc: George Li  
David Krech  
Adrienne Downs



PD

# INTERNATIONAL BUREAU

## Policy Division

### FAX SHEET

Fax Number: (202) 418-2824

This facsimile transmission is intended only for the addressee shown below. It may contain information that is privileged, confidential or otherwise protected from disclosure. Any review, dissemination or use of this transmission or its contents by persons other than the addressee is strictly prohibited. If you have received this transmission in error, please notify us immediately by telephone and mail the original to us at the Federal Communications Commission, International Bureau, 445 12<sup>th</sup> Street S. W., Room 7-4625, Washington, DC 20554.

DATE: 2/19/13

FROM: George Lai

TELEPHONE NUMBER: (202) 418-1462

TO: Patricia Paolotta

FAX NUMBER: 202-1730-1301

TELEPHONE NUMBER: -1300

SPECIAL INSTRUCTIONS: Rubard / Cent mobile

UTC-SSA-20130128-00025 / UTC-214-20120518-00134

THIS COVER SHEET IS PAGE 1 OF 2 PAGES.