



May 10, 2013

**VIA EMAIL**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**ATTN:**

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

**Re: Response of Rubard LLC d/b/a Centmobile to May 3, 2013 Stanacard Letter;  
File No. ITC-214-20120518-00134 (ITC-STA-20120703; ITC-STA-20130128-00025)**

Dear Mr. Ball:

On April 26, 2013, Rubard LLC d/b/a Centmobile (“Rubard”) filed a letter in response to the International Bureau’s (the “Bureau’s”) March 28, 2013 letter requesting that Rubard supplement the information provided in support of its pending section 214 application. On May 3, 2013, Michael P. Donahue, counsel to Stanacard, LLC (“Stanacard”), filed a letter with the Bureau requesting an extension of time to review Rubard’s filing and file a response with the Bureau. Rubard respectfully urges the Bureau to deny this request.

Nearly a year has passed since Rubard applied for Section 214 authority on May 18, 2012. Stanacard opposed Rubard’s application for 214 authority, as well as its subsequent application for Special Temporary Authority.<sup>1</sup> After Stanacard filed those oppositions, it had an

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<sup>1</sup> *Stanacard Petition to Deny International Section 214 Application of Rubard LLC d/b/a Centmobile*, File No. ITC-214-20120518-001 34, 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.

opportunity to respond to Rubard's responses. In addition, the Bureau requested supplemental information relative to Rubard's STA request, to which Rubard responded.<sup>2</sup> Most recently, Rubard submitted a lengthy and highly detailed response to additional questions raised by the Bureau regarding Rubard's 214 application.<sup>3</sup>

The pleading cycle is now over. Stanacard has no right to respond to Rubard's letter under the FCC rules. Section 63.20(d) of the Commission's rules permit (1) any interested party to file a petition to deny an application for 214 authority and (2) the interested party to reply to any opposition to this petition.<sup>4</sup> Stanacard has taken advantage of the opportunity to do both. Neither Section 63.20(d) nor the Bureau's March 28 letter contemplates any further submission from Stanacard.

Further, the Bureau will not benefit from any further pleadings. The applications, oppositions, responses, and replies provide a more than ample record on which to grant Rubard Section 214 authority. Should the Bureau require any more information regarding Rubard's service or its compliance with the Commission's rules, Rubard will forthrightly provide that information. But both Rubard and the Bureau have expended significant resources in responding to and investigating Stanacard's allegations, and the Bureau should not allow Stanacard to extend these well-pled proceedings by initiating another round of responses and replies.

Rubard looks forward to working with Stanacard's new counsel to arrange an opportunity to review the "confidential" declaration appended to Stanacard's July 12 filing to the Bureau.<sup>5</sup> As Rubard noted in its April 26th response, it has made repeated efforts to locate and identify Stanacard's counsel so that it could discuss a protective order under which it could view this document.

Finally, Rubard again requests that the Bureau grant its Section 214 application. Rubard regrets its initial error of providing service without authorization. Rubard has committed itself to regulatory compliance and has retained counsel to assist it in bringing its operations into compliance with the Commission's regulations. Under its STA, Rubard has been providing competitively-priced international services to thousands of consumers and paying into the various social funds established by the Commission. Granting Rubard's application for international authorization would clearly be in the public interest. Should you have any

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<sup>2</sup> Letter from James L. Ball, Chief, Policy Division of the International Bureau, to Patricia Paoletta, Counsel for Rubard (July 19, 2012).

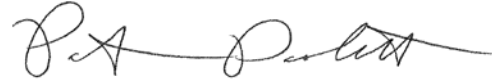
<sup>3</sup> *Response of Rubard LLC d/b/a Centmobile*; File No. ITC-214-20120518-00134 (ITC-STA-20120703; ITC-STA-20130128-00025), filed Apr. 26, 2013.

<sup>4</sup> 47 C.F.R. § 63.20(d).

<sup>5</sup> *Rubard LLC d/b/a Centmobile*, Reply to Opposition to Petition to Deny International Section 214 Application of Rubard LLC d/b/a Centmobile, File No. ITC-214-20120518-00134 (filed July 12, 2012) ("*Stanacard Reply*").

questions regarding the foregoing response, please do not hesitate to contact me at (202) 730-1314.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. A. Paoletta', with a long horizontal flourish extending to the right.

Patricia Paoletta  
*Counsel to Rubard LLC d/b/a Centmobile*

cc: Michael P. Donahue  
Counsel to Stanacard, LLC  
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