



Federal Communications Commission  
Washington, D.C. 20554

March 28, 2013

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

Re: Rubard LLC, d/b/a Centmobile  
ITC-214-20120518-00134 (ITC-STA-20120703-00168; ITC-STA-20130128-00025)

Ms. Paoletta:

This letter is to request that you supplement the information provided by Rubard LLC d/b/a Centmobile (Centmobile) in regards to its pending international section 214 application, referenced above, which is subject to a petition to deny filed by Stanacard, LLC.

Centmobile acknowledges in its Opposition to the Stanacard Petition to Deny that Centmobile began providing international service in April 2011,<sup>1</sup> more than a year prior to filing its international section 214 application. However, in its reply to Centmobile's opposition, Stanacard alleges that there is evidence that Centmobile began providing international telecommunications services in November 2010 and possibly even earlier.<sup>2</sup> Stanacard references archived versions of the Centmobile website appearing on the Internet Archive Wayback Machine (<http://archive.org/web/web.php>) as evidence.<sup>3</sup> Commission staff have accessed the Internet Archive Wayback Machine and found versions of the centmobile.com website ([www.centmobile.com](http://www.centmobile.com)) dated November 8, 2010, November 24, 2010, December 25, 2010, December 30, 2010, January 8, 2011, October 23, 2011, and January 17, 2013, that are all substantially similar and comparably match the current versions of the company's website ([www.centmobile.com](http://www.centmobile.com)). This information raises the question as to whether Centmobile, through previous ownership, may have been providing international telecommunications services requiring prior Commission authorization on these dates and possibly before.

Please respond to the Stanacard reply and provide the following information, with corroborating documents that are in the possession, custody, control or knowledge of Rubard LLC d/b/a Centmobile:

- (1) The date on which Rubard LLC d/b/a Centmobile was formed and the identity of any predecessor-in-interest owning and operating a company doing business as Centmobile.
- (2) A description of the relationships of Artur Zaytsev with any predecessor-in-interest of Centmobile.

---

<sup>1</sup> Opposition to Petition to Deny filed by Rubard LLC d/b/a Centmobile at 5 ("Centmobile has made no secret of the fact that it provided international telecommunications for approximately fourteen months before filing for Section 214 authorization."), Declaration of Alexander Dzerneyko at 1 ("Centmobile began providing international common carrier telecommunications service in approximately April 2011.").

<sup>2</sup> See Stanacard's Petition to Deny International Section 214 Application of Rubard LLC d/b/a Centmobile, at 8, n.33; Reply to Opposition to Petition to Deny International Section 214 Application of Rubard LLC d/b/a Centmobile at 7-8, n.29.

<sup>3</sup> Stanacard Reply at 9-10.



Federal Communications Commission  
Washington, D.C. 20554

- (3) Confirmation as to whether or not Rubard LLC d/b/a Centmobile or predecessor-in-interest maintained a website on any of the dates identified above or before, and also whether or not any of these versions of Centmobile.com identified by the Stanacard reply and viewed by Commission staff on the Internet Archive Wayback Machine, is a website maintained by Rubard LLC d/b/a Centmobile on any of the dates identified above.
- (4) Confirmation as to whether or not Rubard LLC d/b/a Centmobile or any predecessor-in-interest was providing telecommunications services on any of the dates identified above as described in the above attached archived website that included calling cards and/or soliciting business for connecting customers' international telephone calls by using Centmobile numbers and PayPal, or other means. If so, provide a complete description of the services provided and the arrangements for providing the services.
- (5) Confirmation as to whether or not Rubard LLC d/b/a Centmobile or any predecessor-in-interest provided the services described in your response to question (4) above, prior to November 8, 2010. If so, provide the dates in which services were initiated and a description of the services to the extent different from your response to question (4) above.
- (6) A specific description of the involvement if any of either Alexander Dzerneykov or Artur Zaytsev in any provision of services described in your response to questions (3) through (5) above.
- (7) A response to the assertions of Stanacard in its reply that Mr. Zaytsev was involved with obtaining international services for resale from at least one underlying provider since 2009, and possibly operating Centmobile.com through Omnitel Corporation prior to the formation of Rubard LLC d/b/a Centmobile.

Rubard LLC d/b/a Centmobile is directed to support its responses with necessary affidavit or declaration under penalty of perjury. The affidavit or declaration must be signed and dated by an authorized officer of the company with personal knowledge of the representations that are provided in Centmobile's response, verifying the truth and accuracy of the information contained therein, and that all of the information and or documents requested by this letter which are in the possession, custody, control or knowledge have been produced. If multiple employees contribute to the response to this letter, in addition to such general affidavit or declaration of the authorized officer of the company noted above, if such officer (or any other affiant or declarant) is relying on the personal knowledge of any other individual, rather than his or her own knowledge, the company is directed to provide separate affidavits or declarations of each such individual with personal knowledge that identify clearly to which responses the affiant or declarant with such personal knowledge is attesting. All such declarations and or affidavits provided must comply with Section 1.16 of the Commission's Rules and be substantially in the form set forth therein. See 47 C.F.R. §1.16.

This request is being made pursuant to section 63.51 of the Commission's rules, 47 C.F.R. § 63.51. Please provide the supplemental information being requested, no later than by April 19, 2013. Your response should be filed in ITC-214-20120518-00134 via IBFS.



Federal Communications Commission  
Washington, D.C. 20554

If you have questions about this request, please contact David Krech at (202) 418-7443 or Sumita Mukhoty at (202) 418-7165.

Thank you.

Sincerely,

A handwritten signature in blue ink that reads "James L. Ball".

James L. Ball  
Chief, Policy Division,  
International Bureau

Cc: Manlio Carrelli, CEO  
Stanacard LLC  
424 West 33<sup>rd</sup> Street, Suite 410  
New York, NY 10001

J.G. Harrington (Counsel for Stanacard LLC)  
Dow Lohnes PLLC  
1200 New Hampshire Avenue, NW, Suite 800  
Washington, DC 20036