

ATTACHMENT 1

Answer to Question 10:

Section 63.18(c). For both the assignor and assignee, the Commission should address correspondence regarding this application to:

Edwin Janaslani
President
SUPER PREPAID INC.
210 N. Glenoaks Boulevard
Suite B
Burbank, CA 91502
+1 818-618-3763 tel
+1 818-558-1292 fax
edwin@janaslani.com

with a copy to:

John T. Nakahata
WILTSHIRE & GRANNIS LLP
1200 Eighteenth Street NW
Suite 1200
Washington, DC 20036
+1 202-730-1320 tel
+1 202-730-1301 fax
jnakahata@wiltshiregrannis.com

Counsel for Super Prepaid Inc. and Janaslani Enterprises, LLC

Section 63.18(d). The Commission previously has authorized Janaslani Enterprises, LLC (“Janaslani”) to provide global resale telecommunications services in the authorization that is the subject of this *pro forma* assignment notification. See FCC File No. ITC-214-20051122-00478.

Answer to Question 13:

On January 1, 2011,¹ Janaslani consummated a *pro forma* assignment of its International Section 214 Authorization to provide global resale services (FCC File No. ITC-214-20051122-00478), and related common carrier operations, to Super Prepaid Inc. Super Prepaid Inc. intends

¹ As appropriate, Janaslani requests a waiver of the Commission’s requirement that an International 214 authorization holder notify the FCC of a pro forma assignment of authorization within 30 days after the assignment is completed. 47 C.F.R. § 63.24(f)(2). Janaslani’s failure to file this notification within the specified timeframe was inadvertent. Janaslani apologizes for any inconvenience resulting from its failure to file this notification in a timely manner.

Pro Forma Assignment of International Section 214 Authorization
FCC File No. ITC-214-20051122-00478

to continue providing international telecommunications services for the operations transferred from Janaslani for global or limited global resale service.

This is a pro forma assignment because, prior to January 1, 2011, Janaslani and Super Prepaid were independently incorporated entities under 100% common ownership and control. As of January 1, 2011, Janaslani merged into Super Prepaid. Thus, the assignment of the international 214 authorization and common carrier operations is “an assignment from a corporation to a corporation owned or controlled by the assignor stockholders without substantial change in their interests.” 47 C.F.R. § 63.24(d), Note 2. Therefore, Super Prepaid certifies in the attachment to this letter that the assignment is pro forma as defined by Section 63.24(a) of the Commission’s rules and has not resulted in a change of the authorization’s ultimate control. Janaslani retained ultimate control of the international Section 214 authorization both before and after the consummation of the assignment.