

Stanacard, LLC d/b/a Stanatel
Request to Extend Special Temporary Authority
Attachment 1

Response to Question 10:

Stanacard, LLC d/b/a Stanatel (“Applicant”), pursuant to 47 C.F.R. § 63.25, hereby requests that its Special Temporary Authority (“STA”) be extended for a period of sixty (60) days from November 13, 2009 so that Applicant may continue providing international service to customers pending consideration of its International Section 214 Application (File No. ITC-214-20090624-00301), which was separately filed on June 24, 2009. The application has currently been removed from streamlined processing for review by the Department of Justice and is still pending. The Applicant’s initial STA (File No. ITC-STA-20090625-00304) expired on September 14, 2009, and was subsequently granted an extension which is set to expire on November 13, 2009 (File No. ITC-STA-20090902-00407).

Applicant is a reseller of interstate and international prepaid communications services. Grant of this STA is in the public interest as it will allow Applicant to continue providing uninterrupted international services to its customers. Applicant’s target market consists of consumers that often have lower incomes and fewer options available for the purchase of international telecommunications service than options which may be available to the public at large. Discontinuance of the Applicant’s service could result in a widespread loss of telecommunications service to end user customers, which rely on Applicant for cost-effective international communications services. Since Applicant provides international communications on a prepaid basis, a service disruption may result in a situation in which customers cannot be made whole, even if refunds for lost service are available.

Applicant has taken steps to correct this deficiency by filing its International Section 214 Application, a Request for STA, and this subsequent request to extend its STA. Applicant is working closely with communications counsel to ensure that this matter receives necessary attention. Applicant acknowledges that the grant of this STA extension will not prejudice any action the Commission may take on the underlying application seeking authorization to provide international services. Applicant further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing, and that grant of an STA and the underlying application will not preclude enforcement action.

Response to Question 16

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| Section 63.18(d) | Applicant has not previously received authority under Section 214 of the Act. |
| Section 63.18(e)(3) | Applicant requests no authorizations other than those under 63.18(e)(1) and Section 63.18(e)(2) of the Commission’s rules. |
| Section 63.18(g) | Not Applicable. |