

**Stanacard, LLC**  
**Request for Special Temporary Authority**  
**Attachment 1**

**Response to Question 10:**

Stanacard, LLC (“Applicant” or “Company”), pursuant to 47 C.F.R. § 63.25, hereby requests Special Temporary Authority (“STA”) for a period of sixty (60) days so that Applicant may continue providing international service to customers pending consideration of a separately filed application for transfer of control of its international Section 214 authorization (“Transfer Application”).<sup>1</sup>

As detailed in the underlying Transfer Application, Michael Choupak (“Transferor” or “Choupak”) assigned half of his approximately 88.88% ownership interest in Applicant to Anastasia Koroleva (“Transferee” or “Koroleva”) on October 23, 2010. Since Choupak retained *de facto* control of the Company as its Manager, and the transfer was for less than a controlling interest, it was considered presumptively pro forma. On June 21, 2011, Choupak assigned the remainder of his approximately 44.44% ownership interest to Koroleva, resigned his role as the Company’s Manager, and Koroleva was elected Manager in his place. Thus, effective as of June 21, 2011, control of the Company (and its international Section 214 authorization) was transferred from Choupak to Koroleva. The underlying transactions were completely transparent and did not result in a reduction or impairment of service to any of Applicant’s customers. However, Applicant and the parties to the transaction did not seek the Commission’s consent prior to the transfer of control and are requesting this STA as part of a plan to correct any deficiency which may have resulted from this oversight.

Applicant is a reseller of primarily 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 services 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 applications for Commission approval of the transfer of control as well as the instant request for 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 transfer of control application. 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.

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<sup>1</sup> Applicant previously received authority under Section 214 of the Act under File No. ITC-214-20090624-00301.

**Response to Question 16**

Section 63.18(d) Applicant has previously received authority (File No. ITC-214-20090624-00301) under Section 214 of the Act to provide facilities-based service in accordance with Section 63.18(e)(1) of the Commission's rules, and also to provide resale service in accordance with Section 63.18(e)(2) of the Commission's rules.

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.