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July 9, 2012

BY ELECTRONIC SUBMISSION

Mr. Jim Ball
Chief
Policy Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Opposition to Application for STA of Rubard LLC d/b/a Centmobile;
File No. ITC-STA-20120703-00168

Dear Mr. Ball:

Stanacard, LLC (“Stanacard”), by its undersigned attorney, respectfully requests that the Federal Communications Commission (“Commission”) deny the application for Special Temporary Authority (“STA”) of Rubard LLC d/b/a Centmobile (“Centmobile”) under File No. ITC-STA-20120703-00168. Centmobile’s application for STA contains the same defects as its application for international Section 214 authorization.¹ Accordingly, in opposition to the instant request for STA, Stanacard adopts and incorporates by reference its Petition to Deny International Section 214 Application of Rubard LLC d/b/a Centmobile, submitted in File No. ITC-214-20120518-00134 on June 20, 2012.

Furthermore, Centmobile’s request fails to demonstrate how grant of its request would be in the public interest as typically required by the Commission in determining whether an STA is appropriate.² Indeed, granting temporary authorization to a company which has knowingly and intentionally operated in violation of the Commission’s requirements for years would clearly be contrary to the public interest. Such a result would essentially condone unauthorized operations by allowing an intentional wrongdoer to continue operating--purely for continuing commercial gain--after its deliberate circumvention of established authorization procedures (*i.e.*, obtaining international Section 214 authorization *prior* to providing international services) had been discovered. The Commission has regularly denied requests where STA procedures are misused

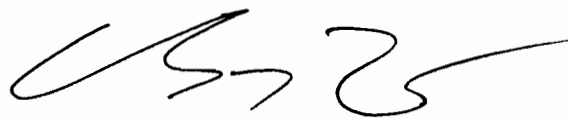
¹ See File No. ITC-214-20120518-00134.

² See, e.g., 47 U.S.C. § 309(f) (stating that STAs may be issued when “extraordinary circumstances requiring temporary operations in the public interest and that delay in the institution of such temporary operations would seriously prejudice the public interest.”)

to circumvent established licensing procedures and, similarly, should also deny the request in the instant case.³

Should you require further information, please contact the undersigned.

Respectfully submitted,



Cheng-yi Liu,
Counsel for Stanacard, LLC

Enclosure

cc: David Krech (david.krech@fcc.gov)
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³ See, e.g., *In re: KHOD(FM), Des Moines, NM, Facility ID No. 165982*, Letter, 25 FCC Rcd 3282, 3285 (2010) (denying STA request in a petition for reconsideration as an “attempt to misuse STA procedures to circumvent established licensing procedures.”), citing *Rancho Palos Verdes Broadcasters, Inc.*, Memorandum Opinion and Order and Notice of Apparent Liability, 18 FCC Rcd 5043, 5048 (2003) (noting, with approval, “a number of staff-level cases where specific STA requests were denied because it was determined that the applicant . . . was using the STA process to circumvent established modification procedures, enhance the facility or make operation more convenient for the broadcaster”).

CERTIFICATE OF SERVICE

I, Stefan Roha, a legal assistant at the Law Offices of Thomas K. Crowe, P.C., do hereby certify that on this 9th day of July, 2012, a copy of the foregoing was served, by the method described below, upon the following:

By first class U.S. Mail, postage prepaid:

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