



WILTSHIRE
& GRANNIS LLP

Mr. Jim Ball
Chief, Policy Division
International Bureau
Federal Communications Bureau
445 12th St SW
Washington, D.C. 20554

July 11, 2012

Re: FCC Form 214STA
Supplemental Letter
ITC-214-20120518-00134

Dear Mr. Ball:

Undersigned counsel files this supplemental letter to respond more fully to Question 10 in the STA form and provide a Justification for expeditious grant of the requested Special Temporary Authority application of Rubard LLC, dba Centmobile (“Centmobile”) filed July 3, 2012.

The justification for Centmobile to provide international telecommunications services pursuant to an STA is to ensure that its existing customers do not lose international service under their prepaid Centmobile plans. It is in the public interest to grant the STA and prevent Centmobile’s existing customers from being disadvantaged if their service provider must discontinue service.

In addition, through this letter, Rubard LLC dba Centmobile acknowledges that a grant of the STA will not prejudice any future Commission action on the underlying application for global facilities-based and resold international telecommunications authority, and that grant of the STA can be revoked or modified by the Commission upon its own motion without a hearing.

Respectfully submitted,

Patricia Paoletta
Counsel to Rubard LLC, dba Centmobile

cc: George Li
David Krech
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