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& GRANNIS LLP

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

July 13, 2012

Re: ITC- STA-20120703-00168

Dear Mr. Ball:

Rubard LLC, dba Centmobile (“Centmobile”) writes in response to Stanacard, LLC’s Opposition to Centmobile’s request for Special Temporary Authority (“STA”).¹ Centmobile respectfully requests that the Bureau disregard the Opposition and expeditiously grant the STA, in order to further the public interest in Centmobile’s existing customers being allowed to continue obtaining service under their prepaid calling plans.

No member of the public has objected to the grant of the STA – only a competitor. The Bureau should not allow a commercial rivalry to unnecessarily expend its resources, especially when its precedent finds that the public interest is served by competition. It is long-standing Commission policy not to involve itself with private contract disputes.²

Stanacard has not shown that Centmobile knowingly, deliberately or intentionally violated Commission rules.³ Centmobile recognizes that pre-authorized service was erroneous and has retained counsel to ensure that it complies with all applicable requirements.

Contrary to Stanacard’s innuendo, granting an STA is “established licensing procedure” in cases such as these.⁴ There is ample Commission precedent for the grant of STAs to providers

¹ See *Opposition to Application for STA of Rubard LLC d/b/a/ Centmobile*; File No. ITC-STA-20120703-00168 (July 9, 2012) (“*Stanacard Opposition*”) available at http://licensing.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/related_filing.htm?f_key=-244205&f_number=ITCSTA2012070300168.

² See *Actions Taken Under the Cable Landing License Act*, Public Notice, 20 FCC Rcd 8557 at n. 12 (Int’l Bur. 2005) (“It is long-standing Commission policy not to involve itself with private contract disputes”).

³ See *Stanacard Opposition*.

⁴ Moreover, the STA would not have been necessary but for the *Petition to Deny* Stanacard filed.



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that offer international calling prior to Commission authorization, especially when existing customers may be harmed by denial of an STA.

As Centmobile has acknowledged, grant of the STA is without prejudice to the Commission's action on the underlying Section 214 application, so Stanacard's arguments are inapposite.⁵ Centmobile has likewise acknowledged that grant of the STA can be revoked or modified by the Commission upon its own motion without a hearing.⁶

As noted above, the public interest will be served by granting the requested STA and by preventing Centmobile's existing customers from being disadvantaged by a discontinuance of service. Accordingly, Centmobile hereby renews its request for Special Temporary Authority filed July 3, 2012 while the Commission considers the underlying Section 214 application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. A. Paoletta'.

Patricia Paoletta
Counsel to Rubard LLC, dba Centmobile

cc: George Li
David Krech
Adrienne Downs

⁵ See *Supplemental Letter*, Rubard LLC dba Centmobile, available at http://licensing.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/related_filing.hts?f_key=-244205&f_number=ITCSTA2012070300168.

⁶ *Id.*

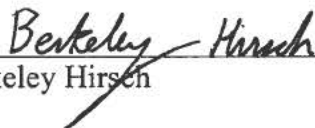
CERTIFICATE OF SERVICE

I, Berkeley Hirsch, a legal assistant at the Law Offices of Wiltshire & Grannis LLP, do hereby certify that on this 13th day of July, 2012, a copy of the foregoing Response to Stanacard, LLC's Opposition to the STA of Rubard LLC dba Centmobile was served, by the method described below, upon the following:

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

ATTN: Mr. Cheng-Yi Liu
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