

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

July 24, 2012

Re: FCC Form 214STA  
ITC-STA-20120703-00168

Dear Mr. Ball:

Rubard LLC, dba Centmobile (“Centmobile”) provides international calling at among the lowest rates in the market, and its customers would be economically harmed by having such service discontinued. In such an event, for most routes, Centmobile customers would have to pay higher prices for the same product. The representative chart below shows the economic value that Centmobile’s customers enjoy and may highlight a reason a competitor would have for driving Centmobile from the market:<sup>1</sup>

Route	Rates (/min)	
	Centmobile	Stanacard
Cameroon	1.6¢	1.89¢
Pakistan	1.95¢	3.2¢
Nigeria	6.6¢	7.9¢
Kenya	7.99¢	8.49¢
Poland	0.99¢	2.28¢
China	1.99¢	2.16¢
Sri Lanka	7.99¢	8.05¢
Syria	7.99¢	8.93¢
El Salvador	12.99¢	13.17¢
Ghana	14.9¢	19.9¢

Additional route rates comparisons may be found on the respective websites of [www.centmobile.com](http://www.centmobile.com) and [www.keku.com](http://www.keku.com), Stanacard’s trade name.

<sup>1</sup>The table reflects prices advertised as of July 20, 2012, independent of any additional promotions the companies may offer.

In response to your letter of July 19, 2012, Centmobile provides the following answers to your questions:

1. *What service is Centmobile providing to its customers? Please clarify whether Centmobile is providing just international service or both domestic and international service?*

Centmobile provides both domestic and international service, with a small amount being domestic. Centmobile designed its innovative system to reduce overhead costs, compared to its competitors, and therefore can offer some of the lowest prices in the market. In addition, Centmobile saves its customers money by not printing cards and by offering services only through the Internet. Centmobile also runs various programs to reward its loyal customers. All of Centmobile's customers – 100% - receive some amount of credit towards the free use of service after their purchased minutes are depleted. For example, most of Centmobile's customers have been rewarded a \$20 bonus of free minutes after their first deposit. Were Centmobile to discontinue service, a substantial value in free minutes would be lost to customers. Based on a report run after receipt of your letter, the current value of unused bonus minutes is \$91,403.00. Centmobile plans to provide this \$91,403.00 of free service to its customers. For Centmobile's price-sensitive customer base, the loss of such economic value is contrary to the public interest, particularly in the current economic environment.

2. *Please describe how the service is provided to the customers.*

Centmobile offers global voice calling services through prepaid plans, the accounts for which are established by customers directly through Centmobile's website, [www.centmobile.com](http://www.centmobile.com). Centmobile provides service through its access numbers, as well as utilizing a call forwarding feature whereby the customer can simply dial a local phone number and have the call forwarded to the international destination. Centmobile's innovative technology allows it to significantly reduce the cost of operating such a business and as a result pass these savings to the consumer. To maximize convenience for a range of customers, with a range of incomes, Centmobile offers a variety of plans, from \$5.00 up to \$200.00 – all prepaid using credit or debit cards. Centmobile customers can replenish their accounts by adding monetary value to their on-line accounts at any time.

If Centmobile were to terminate service, it would refund the dollar balance of unused paid minutes, but many customers would lose the value of their remaining free minutes – totaling in the aggregate \$91,403.00.

3. *How many customers does Centmobile currently have, both international and domestic?*

[REDACTED]



The attached certification by Alexander Dzerneyko certifies to the accuracy of the information provided.

Because it is in the public interest to ensure that Centmobile's existing customers are not disadvantaged by any discontinuance of service, and because any action on the STA is without prejudice to Commission action on the underlying Section 214 application, Centmobile reiterates its request for Special Temporary Authority, originally filed July 3, 2012. Grant of the STA to avoid a disruption of service for Centmobile's customers is well within Commission precedent.<sup>2</sup>

Respectfully submitted,



Patricia Paoletta  
Counsel to Rubard LLC, dba Centmobile

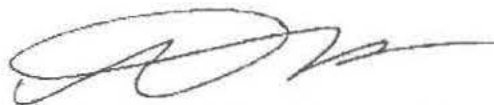
cc: George Li  
David Krech  
Adrienne Downs

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<sup>22</sup> See, e.g., *Domestic Section 214 Application Filed for the Transfer of Control of STi Prepaid, LLC to Vivaro Corporation*, 25 FCC Rcd. at 14309 (2011); *Domestic Section 214 Application Filed for the Transfer of Control of Aries Network, Inc. to NobelTel, LLC*, 25 FCC Rcd. at 3648 (2010). The precedent Stanacard, LLC cites in its *Reply to Response to Opposition to Application for STA of Rubard LLC d/b/a Centmobile* are Title III radio cases. Centmobile is not using radio spectrum nor seeking a radio license. Section 214's temporary authorization references do not require a demonstration of extraordinary circumstances nor a showing that delay would seriously prejudice the public interest. To the contrary, Section 214(a), after referencing the public convenience and necessity criteria, provides that "the Commission may, upon appropriate request being made, authorize temporary or emergency service, or the supplementing of existing facilities, without regard to the provisions of this section." 47 U.S.C. § 214(a). Section 63.25 of the Commission's Rules cites as its origin Section 303, in Title III. See 47 C.F.R. § 63.25 (Parts 40-69, revised as of October 2011, at 251). In any event, Section 63.25 has no extraordinary circumstances requirement, unlike Section 1.931, governing STAs for wireless facilities. See Section 1.931(b)(4), 47 C.F.R. § 1.931(b)(4).

**DECLARATION OF ALEXANDER DZERNEYKO**

I, Alexander Dzerneyko, Manager of Rubard LLC dbaCentmobile, do hereby certify to the accuracy of the information provided in counsel's letter of today's date, including the answers to the questions in International Bureau's letter of July 19, 2012.



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Alexander Dzerneyko  
Executed on July 24, 2012