



Federal Communications Commission  
Washington, D.C. 20554

July 19, 2012

Patricia Paoletta  
Counsel to Rubard LLC, d/b/a Centmobile  
Wiltshire & Grannis, LLP  
Suite 1200  
1200 18<sup>th</sup> Street, NW,  
Washington, DC 20036

Re: Rubard LLC, d/b/a Centmobile  
ITC-STA-20120703-00168

Ms. Paoletta:

We are reviewing the Special Temporary Authority (STA) request that you filed on behalf of Rubard LLC, d/b/a Centmobile (Centmobile) on July 3, 2012, and find that we need additional information in connection with assessing the potential effect of your request on Centmobile international customers. Pursuant to section 63.51 of the Commission's rules, 47 C.F.R. § 63.51, we request that Centmobile provide the following information:

- 1) What service is Centmobile providing to its customers? Please clarify whether Centmobile is providing just international service or both domestic and international service.
- 2) Please describe how the service is provided to the customers.
- 3) How many customers does Centmobile currently have, both international and domestic?

An officer of Centmobile should certify to the accuracy of the information provided. The response should be submitted in the file for the STA request electronically via IBFS. In addition, the response must be served on counsel to Stanacard, LLC.

We look forward to hearing back from you with this information. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "James L. Ball".

James L. Ball  
Chief, Policy Division  
International Bureau

Cc: Mr. Cheng-Yi Liu  
Counsel to Stanacard, LLC  
Law Offices of Thomas K. Crowe, P.C.  
Suite 300  
1250 24<sup>th</sup> Street, N.W.  
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