



Federal Communications Commission
Washington, D.C. 20554

August 23, 2012

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

Re: Rubard LLC, d/b/a Centmobile
ITC-214-20120518-00134
ITC-STA-20120703-00168

Ms. Paoletta:

This letter is in response to your request for Special Temporary Authority (STA) filed on behalf of Rubard LLC, d/b/a Centmobile (Centmobile) in regard to its pending international section 214 application. In the application, Centmobile requests authority to provide international facilities-based and resale services, pursuant to the Commission's rules.¹ Stanacard LLC (Stanacard) opposes grant of both the 214 application and the STA request.²

Centmobile is now providing services for which it seeks authority to provide in its application.³ It seeks an STA in order to continue services to existing customers under their prepaid plans during the pendency of its application. Stanacard opposes the request, arguing that it has established a *prima facie* case that Centmobile's underlying application must be denied and that Centmobile has not established a public interest basis for grant of an STA.⁴ While we view Centmobile's actions and Stanacard's allegations as serious and meriting careful consideration, we will not determine, in the context of acting on this STA, whether Stanacard has made a *prima facie* case that Centmobile's international section 214 application should be denied. By this letter, we grant in part Centmobile's request for a limited STA subject to conditions for the purpose of permitting it to temporarily continue the provision of resale services during the pendency of its application.

¹ 47 U.S.C. § 214; 47 C.F.R. § 63.18.

² Stanacard *Petition to Deny International Section 214 Application of Rubard LLC d/b/a Centmobile*, File No. ITC-214-20120518-00134, filed June 20, 2012; *Reply to Opposition to Petition to Deny International Section 214 Application of Centmobile*, filed July 12, 2012; *Opposition to Application for STA of Centmobile*, File No. ITC-STA-20120703-00168, filed July 9, 2012; and *Reply to Response to Opposition to Application for STA of Centmobile*, filed July 16, 2012.

³ Stanacard informed the Commission that Centmobile had been providing service prior to filing its application. See Stanacard *Petition to Deny* at 8-9. Centmobile subsequently acknowledged that it has been providing resale service. See Letters from Patricia Paoletta, Counsel to Centmobile, dated July 3, 2012, July 11, 2012, and July 13, 2012.

⁴ *Opposition to Application for STA of Centmobile*, filed July 9, 2012; and Stanacard's *Reply to Response to Opposition to Application for STA of Centmobile*, filed July 16, 2012.

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We authorize Centmobile, for a period of 180 days, to expire on February 19, 2013, to provide international resale services provided that Centmobile complies with all applicable Commission rules in providing such international resale services. As acknowledged by Centmobile,⁵ (1) the grant of this STA does not prejudice any action the Commission may take on Centmobile's underlying application, or any other action that it may take as a result of Centmobile's provision of service prior to obtaining authority to do so, and (2) this STA may be revoked or discontinued by the Commission, at any time and on its own motion, without a hearing.

Sincerely,



James L. Ball
Chief, Policy Division,
International Bureau

Cc:
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⁵ See Letter from Patricia Paoletta, Counsel to Centmobile, dated July 13, 2012, at 2.