

Question 10:

Moontius LLC (“Moontius”) is a new Delaware company, formed to provide prepaid calling card and wireless resale services. Moontius applied for an international section 214 authorization from the FCC on July 9, 2012. Its application was sent to Team Telecom for review on or around August 3, 2013. Moontius has completed the Team Telecom triage questionnaire and submitted it for review. Based on the experience of its counsel, Moontius’s application will likely be under review at various federal agencies of Team Telecom for another 8 months.

Moontius is currently undertaking the acquisition of approximately 130,000 customers of UltraTone Sdn Bhd, a Malaysian company, and must do so by the end of January. It has not yet acquired the customers. The UltraTone customers require origination and termination in the United States and Moontius must have the international Section 214 authorization to legally provide them services.

If Moontius is unable to obtain the 214 authorization by the end of January, it may not be able to complete the acquisition of the UltraTone customers and the investment of time and money by its founders may be lost. In addition, UltraTone may transfer the customers to another entity instead of Moontius, and Moontius will lose market share to its competitors. In the competitive and dynamic market for international prepaid calling card and wireless services, weeks are critical and an 8-month wait would mean Moontius would likely fail.

Moontius acknowledges that grant of a Special Temporary Authority (STA) will not prejudice any action the Commission may take on the underlying application seeking an international Section 214 authorization. Moontius further acknowledges that the STA can be revoked by the Commission upon its own motion without a hearing.

Question 16:

(d) Moontius has not received authority previously under Section 214 of the Communications Act.

(e) Moontius certifies that it will comply with the terms and conditions contained in sections 63.21, 63.22 and 63.23 of the Commission's rules.

(f) At this time, Moontius seeks no other authorization available under Section 63.18(e).

(g) Not applicable.