

RUBARD LLC d/b/a CENTMOBILE

ATTACHMENT 1

214STA Question 10 – Justification:

Rubard LLC d/b/a Centmobile (“Centmobile”) seeks a renewed STA in order to continue to provide affordable international calling services during the pendency of Commission review of Centmobile’s Section 214 application filed in May 2012. Centmobile requires a renewed STA to ensure that its existing customers do not lose international service under their prepaid Centmobile plans. It is in the public interest to grant a renewed STA and prevent Centmobile’s existing customers from being disadvantaged from any discontinuance of service.

Centmobile acknowledges that a grant of the STA will not prejudice any future Commission action on the underlying application for global facilities-based and resold international telecommunications authority, and that grant of the STA can be revoked or modified by the Commission upon its own motion without a hearing.

214STA Question 16:

Response to §63.18(d)

Centmobile has not previously received authority under Section 214 of the Act other than its original STA granted August 23, 2012 for global resale authority.

Response to §63.18(e)(3)

Centmobile applied for authority to provide facilities-based services pursuant to § 63.18(e)(1) and resell the services of authorized carriers pursuant to §63.18(e)(2) to all international points authorized by the Commission on May 18, 2012. In the instant application, Centmobile is applying to extend the date of its STA for global resale authority. Centmobile will comply with the terms and conditions contained in 47 C.F.R. §§ 63.21 and 63.23.

Response to §63.18(g)

Not applicable.