

Mr. James Ball
Chief, Policy Division
International Bureau
Federal Communications Bureau
445 12th St SW
Washington, D.C. 20554

January 28, 2013

Attachment 3

Re: FCC Form 214STA ITC-STA-20120703-00168 and ITC-214-20120518-00134

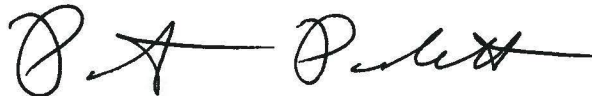
Dear Mr. Ball:

This letter serves as Attachment 3 to the renewed Special Temporary Authority (“STA”) application of Rubard LLC d/b/a Centmobile (“Centmobile”) filed January 28, 2013 to extend the date of Centmobile’s existing STA. On August 23, 2012, your office granted an STA to Centmobile to provide resale authority for 180 days. This grant expires on February 19, 2013.

As of the writing of this letter, Centmobile still waits for a determination on the above-referenced 214 application for global facilities-based and resale authority, which was removed from streamlined processing June 22, 2012. To ensure that Centmobile can continue to provide service to its prepaid customers while it awaits this determination, Centmobile seeks an extension of its STA to provide resold international telecommunications services.

Centmobile recognizes that providing international services prior to express authorization by the Commission is not permitted by its rules. Centmobile seeks expeditious treatment of its STA in order to continue to provide affordable international calling services during the pendency of Commission review of the above referenced 214 application. Centmobile acknowledges that grant of renewed STA for an additional six months is without prejudice to Commission action on the underlying 214 application and that the Commission may revoke or modify a renewed STA upon its own motion without a hearing.

Respectfully submitted,



Patricia Paoletta
Counsel to Rubard LLC, dba Centmobile

cc: George Li
David Krech
Adrienne Downs