



ATTACHMENT 3

July 26, 2013

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

Re: FCC Form 214STA; ITC-214-20120518-00134

Dear Mr. Ball:

This letter by undersigned counsel serves as Attachment 3 to the Special Temporary Authority application of Rubard LLC d/b/a Centmobile filed July 26, 2013. On February 19, 2013, your office renewed its previous grant of Special Temporary Authority (“STA”) to provide global resold international telecommunications services for an additional 180 days. This grant expires on August 19, 2013.

Rubard applied to the Bureau for international Section 214 authority in May 2012. To ensure that Rubard’s customers can continue to use their Centmobile prepaid service while Rubard awaits this determination, Rubard seeks an extension of its STA to provide resold international telecommunications services. Renewing Rubard’s STA will ensure that its existing customers do not lose international service under their prepaid Centmobile plans. This grant will therefore serve the public interest by preventing Rubard’s customer base from being disadvantaged by a discontinuance of service.

Rubard recognizes that providing international services prior to express authorization by the Commission is not permitted by its rules. Rubard seeks expeditious treatment of its STA, which it acknowledges does not prejudice any future Commission action and can be revoked or modified by the Commission upon its own motion without a hearing, in order to provide affordable international calling services during the pendency of Commission review.

Respectfully submitted,

Patricia Paoletta
Counsel to Rubard LLC d/b/a Centmobile

cc: David Krech
Adrienne Downs