

ATTACHMENT 1

Application Of Mobile Financial Services, LLC For Special Temporary Authority To Provide International Resold Services

Pursuant to Section 63.25 of the Commission's rules,¹ Mobile Financial Services, LLC ("MFS") requests special temporary authority ("STA") to provide international telecommunications services on a resale basis between the United States and all international points (except any points on the Commission's exclusion list). MFS also is filing contemporaneously an application seeking a Section 214 authorization to provide international telecommunications services on a resale basis ("Section 214 Application").

Answer to Question 10 (Justification of Need for STA)

As explained in the Section 214 Application, MFS is a wholly-owned direct subsidiary of TeleWare Group Plc, a British company, and is indirectly owned and controlled by Geoffrey Richard Haworth, a British citizen. MFS therefore anticipates that the Section 214 Application will be subject to review by the Departments of Justice, Homeland Security and Defense and the Federal Bureau of Investigation ("Team Telecom") for national security concerns. MFS requests this STA for authority to provide international telecommunications services during the Section 214 Application process.

MFS seeks to operate as a Mobile Virtual Network Operator ("MVNO") in the United States. MFS intends to enter the market to serve a niche group of enterprise companies that have a mobile workforce and a new federal regulatory obligation to record and retain certain calls. MFS fully understands Team Telecom's review, and seeks the STA so to help enable timely compliance with the new federal rules.

Accordingly, MFS requests that the Commission grant an STA as soon as possible, and no later than November 1, 2013, for a period of 180 days. Grant of this STA request would allow MFS to provide international telecommunications services while the Commission and Team Telecom continue to consider the Section 214 Application and MFS responds to any questions Team Telecom may have. Thus, the STA serves the public interest.

MFS acknowledges that the grant of this STA will not prejudice any action the Commission may take on the underlying Section 214 Application. MFS further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing.

Answer to Question 16 (Responses to 47 C.F.R. §§ 63.18(d), (e)(3) and (g))

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

¹ 47 C.F.R. § 63.25.

- (e)(3)** Because MFS does not seek authority to acquire facilities or to provide services that are not covered by Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules, subsection (e)(3) is not applicable.
- (g)** Because MFS does not seek facilities-based authority under Section 63.18(e)(3) of the Commission's rules, subsection (g) is not applicable.