

**Response to Item 10:**

Special Temporary Authority (“STA”) is hereby requested for Ropir Communications, Inc. (“RCI”) to continue uninterrupted service to the public while an application for Section 214 authorization of changes in the ownership and control of RCI is processed by the Commission (the “214 Application”).<sup>1</sup>

As explained in detail in the attached letter request for Domestic Section 214 STA, a review of company records brought to light certain facts which resulted in unauthorized, voluntary and involuntary transfers of control of RCI since international Section 214 authorization was granted to RCI in 1996.<sup>2</sup>

RCI remains the carrier of record to customers. Grant of the requested STA will serve the public interest, convenience and necessity because it will permit the continued provision of service by RCI without interruption to customers while the Commission considers the 214 Application. Customers rely upon RCI for telecommunications service and would be adversely impacted if there was a disruption of service while the 214 Application is processed. This STA request and the 214 Application demonstrate the qualifications of Robert E. L. Gilpin to control RCI in his capacity as Personal Representative of the Estate of Billie K. Pirnie, and that the past transfers of control of RCI do not present any eligibility or anticompetitive concerns under applicable Commission rules and policies.

As the international Section 214 authorization holder, RCI acknowledges that grant of this STA request will not prejudice any action the Commission may take on the 214 Application. The

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<sup>1</sup> RCI and its affiliate, Union Springs Telephone Company, are parties to a Joint Application for Domestic and International Section 214 authorizations filed contemporaneously herewith.

<sup>2</sup> File No. ITC-214-19960207-00059 (formerly File No. 96-100), granted April 1, 1996.

parties further acknowledge that STA may be revoked by the Commission upon its own motion without a hearing.

**Response to Item 16:**

With reference to Section 63.18(d) of the Commission's rules, RCI holds the following international Section 214 authorization which is the subject of this STA request: File No. ITC-214-19960207-00059 (formerly File No. 96-100), granted April 1, 1996.<sup>3</sup> That authorization is for Global or Limited Global Resale Service.

In response to Section 63.18(e)(3) of the Commission's rules, RCI hereby certifies that it will comply with the terms and conditions contained in Section 63.22 of the Commission's rules. (Section 63.21 which concerns facilities-based international carriers is inapplicable to this STA request.)

Section 63.18(g) of the Commission's rules is not applicable because RCI does not seek facilities-based authority.

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<sup>3</sup> See Public Notice Report No. I-8167, released April 4, 1996.