

RUBARD LLC d/b/a CENTMOBILE

**ATTACHMENT 1**

**214STA Question 10 – Justification:**

Rubard LLC d/b/a Centmobile (“Rubard”) seeks a renewed STA in order to continue to provide affordable international calling services during the pendency of Commission review of Rubard’s Section 214 application filed in May 2012. Rubard 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 Rubard’s existing customers from being disadvantaged from any discontinuance of service.

Rubard 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)*

Rubard has not previously received authority under Section 214 of the Act other than its original STA granted August 23, 2012 for global resale authority and the renewals of that STA on February 19, 2013, and August 19, 2013, with the latter extending temporary authority pending review of its International Section 214 Application until February 15, 2014.

*Response to §63.18(e)(3)*

Rubard 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, Rubard is applying to extend the date of its STA for global resale authority. Rubard 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.