



WILTSHIRE
& GRANNIS LLP

ATTACHMENT 3

February 6, 2014

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 serves as Attachment 3 to the Special Temporary Authority (“STA”) application of Rubard LLC d/b/a Centmobile filed today. On August 19, 2013, your office renewed its previous STA to Rubard to provide global resold international telecommunications services for an additional 180 days. This grant expires on February 15, 2014.

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 that decision, Rubard seeks an extension of its STA to provide resold international services. Renewing Rubard’s STA will ensure that its existing customers do not lose service under their prepaid Centmobile plans. This grant will therefore serve the public interest by shielding those customers from a discontinuance of service.

Since its current STA was granted, Rubard has entered into a Consent Decree with the Enforcement Bureau to end its investigation of preauthorized service. The Consent Decree includes a Compliance Plan with reporting requirements.

Rubard acknowledges that grant of its instant STA request does not prejudice any future Commission action and can be revoked or modified by the Commission upon its own motion without a hearing.

Respectfully submitted,

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

cc: David Krech
Adrienne Downs