

Roman LD, Inc.
Request for Special Temporary Authority
Attachment 1

Response to Question 10:

Roman LD, Inc. (“Applicant” or “Company”), pursuant to 47 C.F.R. § 63.25, hereby requests Special Temporary Authority (“STA”) for a period of 180 days so that Applicant may continue providing international service to customers pending consideration of a separately filed application for transfer of control (File No. ITC-T/C-20150722-00179) of its international Section 214 authorization (“Transfer Application”).¹

As detailed in the underlying Transfer Application, Sapina Quayum transferred 100% of the Company to Monotaz Begum on January 2, 2013. The underlying transaction was completely transparent and did not result in a reduction or impairment of service to any of Applicant’s customers. However, Applicant and the parties to the transaction did not seek the Commission’s consent prior to the transfer of control and are requesting this STA as part of a plan to correct any deficiency which may have resulted from this oversight.

Applicant, a Texas corporation, is a non-facilities-based interexchange carrier that provides domestic and international long distance telecommunications service on a purely resold basis. Grant of this STA is in the public interest as it will allow Applicant to continue providing uninterrupted telecommunications services to its customers. Discontinuance of the Applicant’s service could result in a widespread loss of telecommunications services to end user customers.

Applicant has taken steps to correct this deficiency by filing applications for Commission approval of the transfer of control as well as the instant request for STA. Applicant acknowledges that the grant of this STA extension will not prejudice any action the Commission may take on the underlying transfer of control application. Applicant further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing, and that grant of an STA and the underlying application will not preclude enforcement action.

¹ Applicant previously received authority under Section 214 of the Act under File No. ITC-214-20110512-00132. Applicant notes that there was an error in Attachment 2 of its application under File No. ITC-214-20110512-00132. The Amended Attachment 2 submitted on May 17, 2011 erroneously referenced a different company, “Syoptics Networks, Inc.,” where it should have referenced “Roman LD, Inc.,” the actual authorization holder. Applicant submitted a corrected Attachment 2, for the record, on August 12, 2015.

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Response to Question 16:

Section 63.18(d) – Applicant has previously received authority (File No. ITC-214-20110512-00132) under Section 214 of the Act to provide facilities-based service in accordance with section 63.18(e)(1) of the Commission’s rules, and also to provide resale service in accordance with section 63.18(e)(2) of the Commission’s rules.

Section 63.18(e)(3) – Applicant requests no authorizations other than those under 63.18(e)(1) and Section 63.18(e)(2) of the Commission’s rules.

Section 63.18(g) – Not Applicable.