

Aug 27 2015

Roman LD Inc.

Re: ITC-T/C-20150722-00179

Policy Division
International Bureau
Roman LD, Inc.

Request for Special Temporary Authority
Attachment 1

date: August 27, 2015
authorized by: Chief, Policy Division, International Bureau
signature <i>Melissa Cozza</i>

Expires: February 23, 2016

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, "Synoptics 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.

MODE = MEMORY TRANSMISSION

START=AUG-27 15:39

END=AUG-27 15:41

FILE NO.=147

-INTERNATIONAL BUREAU -

STN NO.	COMM. ABBR NO.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK		917039120486	002/002	00:01:31

***** -INTL BUREAU - ***** 202 418 2824- *****



PD

INTERNATIONAL BUREAU Policy Division

FAX SHEET

Fax Number: (202) 418-2824

This facsimile transmission is intended only for the addressee shown below. It may contain information that is privileged, confidential or otherwise protected from disclosure. Any review, dissemination or use of this transmission or its contents by persons other than the addressee is strictly prohibited. If you have received this transmission in error, please notify us immediately by telephone and mail the original to us at the Federal Communications Commission, International Bureau, 445 12th Street S.W., Room 7-4653, Washington, DC 20554.

DATE: 8/27/15

FROM: Adrienne McNeil

TELEPHONE NUMBER: (202) 418- 0412

TO: Cheng-yi Liu

FAX NUMBER: 703-812-0186

TELEPHONE NUMBER: 703-812-0478

SPECIAL INSTRUCTIONS:

ITC-STA-80150820-06208 -- ITC-T/C-80150722-00179

THIS COVER SHEET IS PAGE 1 OF 2 PAGES.