The instant application seeks Federal Communications Commission approval for the transfer of control of Stanacard, LLC's ("Stanacard's" or "Company's") section 214 authorization in connection with an assignment of ownership interest consummated on June 21, 2011 (the "2011 Transaction"). Specifically, the 2011 Transaction transferred control of Stanacard from Michael Choupak ("Transferor" or "Choupak") to Anastasia Koroleva ("Transferee" or "Koroleva").

Since the Transactions were already consummated, a separate request for Special Temporary Authority is being submitted concurrently with this application.

ANSWER TO QUESTION 10:

In response to 47 C.F.R. § 63.18(c):

Please direct all correspondence concerning this application to the Company's counsel:

Cheng-yi Liu
Law Offices of Thomas K. Crowe, P.C.
1250 24th St., NW, Suite 300
Washington, D.C. 20037
Phone: (202) 263-3640

In response to 47 C.F.R. § 63.18(d):

Stanacard previously received authority under Section 214 of the Act to provide international switched services on a facilities-based (Section 63.18(e)(1)) and resale basis (Section 63.18(e)(2)) under File No. ITC-214-20090624-00301. The Transferor and Transferee, both individuals, have not previously received authority under Section 214 of the Act.

ANSWER TO QUESTION 11:

Ownership of Stanacard Prior to October 23, 2010

Prior to October 23, 2010,[1] the following persons or entities held, directly or indirectly, at least ten (10) percent of the equity in Stanacard:

[1] Prior to August 13, 2010, Aleksandr Palatkevich held 1,000 Class A Units (1000 out of 10,000, or 10%) membership interest in the Company. However, Mr. Palatkevich's entire interest was repurchased by the Company on August 13, 2010. No interests were transferred or assigned as a result of this repurchase.

Name/Address	% of Shares (approximate)	Citizenship	Principal Occupation/ Business
Michael Choupak 424 West 33rd Street, Suite 410 New York, NY 10001-2651	88.88%	U.S.	Technology
Eduard Romanov 424 West 33rd Street, Suite 410 New York, NY 10001-2651	11.11%	U.S.	Technology

No other entities or individuals held a ten percent (10%) or greater attributable ownership interest in Stanacard.

Ownership of Stanacard from October 23, 2010 through June 21, 2011

From October 23, 2010 through June 21, 2011, the following persons or entities held, directly or indirectly, at least ten (10) percent of the equity in Stanacard:

Name/Address	% of Shares (approximate)	Citizenship	Principal Occupation/ Business
Michael Choupak 424 West 33rd Street, Suite 410 New York, NY 10001-2651	44.44%	U.S.	Technology
Anastasia Koroleva 424 West 33rd Street, Suite 410 New York, NY 10001-2651	44.44%	U.S.	Technology
Eduard Romanov 424 West 33rd Street, Suite 410 New York, NY 10001-2651	11.11%	U.S.	Technology

No other entities or individuals held a ten percent (10%) or greater attributable ownership interest in Stanacard.

Ownership of Stanacard as of June 21, 2011

Effective June 21, 2011, the following persons or entities currently hold, directly or indirectly, at least ten (10) percent of the equity in Stanacard:

Name/Address	% of Shares (approximate)	Citizenship	Principal Occupation/ Business
Anastasia Koroleva 424 West 33rd Street, Suite 410 New York, NY 10001-2651	88.88%	U.S.	Technology
Eduard Romanov 424 West 33rd Street, Suite 410 New York, NY 10001-2651	11.11%	U.S.	Technology

No other entities or individuals hold a ten percent (10%) or greater attributable ownership interest in Stanacard.

ANSWER TO QUESTION 13:

Prior to October 23, 2010,[2] Choupak held 8000 Class A Units (8000 out of a total 9000, or approximately 88.88%) in Stanacard and also served as the Company's Manager. Pursuant to an Interest Transfer Agreement dated September 27, 2009 and a Bill of Transfer, Sale and Assignment dated October 23, 2010, Choupak assigned 4000 Class A Units to Koroleva on October 23, 2010 ("2010 Transaction"). The 2010 Transaction transferred approximately 44.44% of ownership to Koroleva, with Choupak retaining an equal (approximately 44.44%) ownership percentage. However, *de facto* control of Stanacard remained with Choupak as the Company's Manager. Since Choupak maintained *de facto* control of the Company and the interest assigned was less than a controlling one, the 2010 Transaction would qualify as a presumptively pro forma or non-substantial transfer of control under the Commission's rules.[3]

Subsequently, Choupak assigned the remainder of his 4000 Class A Units and approximately 44.44% ownership interest to Koreleva on June 21, 2011 ("2011 Transaction"). Also on June 21, 2011, Choupak resigned his role as Manager and Koroleva was elected as his replacement, effectively transferring control of the Company to Koroleva. By the instant application, Stanacard requests Commission approval for the substantial transfer of control resulting from the 2011 Transaction.

ANSWER TO QUESTION 20:

Stanacard requests streamlined processing of the application. The application qualifies for streamlined processing under Section 63.12 because the applicant is not affiliated with a foreign carrier, is not affiliated with a dominant U.S. carrier, and the Company qualifies for a presumption of non-dominance under Section 63.10(a)(4). Furthermore, the application also qualifies for streamlined processing under Section 63.03(b)(1)(ii) since the Transferee, an individual, is not a telecommunications provider.

Explanation for Answer to Question 22:

Applicant is unable to certify "yes" to this question because the 2011 Transaction was consummated without prior Commission approval on June 21, 2011. Applicant will be filing a separate request for Special Temporary Authority.

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[2] Prior to August 13, 2010, Aleksandr Palatkevich held 1,000 Class A Units (or 10%) membership interest in the Company. However, Mr. Palatkevich's entire interest was repurchased by the Company on August 13, 2010. No interests were transferred or assigned as a result of this repurchase.

[3] *See* 47 C.F.R. § 63.24(d).

DOMESTIC APPLICATION SUPPLEMENT

Pursuant to 47 C.F.R. § 63.04 (b), the following information corresponding to 47 C.F.R. §§ 63.04(a)(6) – (a)(12) is supplied in connection with the Joint International and Domestic Application for the Consent to Assignment and Transfer of Control of 214 Authorized Carrier and is intended to fulfill the requirements for the transfer of control of a domestic carrier.

1. **Section 63.04(a)(6) - Description of the transaction:**

   See ANSWER TO QUESTION 13, *supra*.

2. **Section 63.04(a)(7) - A description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:**

   Neither the Transferor nor Transferee provide domestic telecommunications services. Stanacard is a reseller of primarily international long distance telecommunications services throughout the U.S.

3. **Section 63.04(a)(8) - A statement as to how the application fits into one or more of the presumptive streamlined categories in section 63.03 or why it is otherwise appropriate for streamlined treatment:**

   Since the Transferee is not a telecommunications provider, streamlined processing is appropriate under 47 C.F.R. § 63.03(b)(1)(ii). Further, since the Company has a share of less than 10 percent of the interstate, interexchange market, provides services exclusively in areas served by dominant local exchange carriers that are not a party to the transaction and no party to the transaction described above is dominant with respect to any service, streamlined processing is appropriate under 47 C.F.R. § 63.03(b)(2)(i).

4. **Section 63.04(a)(9) -Identification of all other Commission applications related to the same transaction:**

   Separate requests for Special Temporary Authority are being submitted to the FCC's International Bureau and Wireline Competition Bureau. If necessary, file numbers for these requests can be provided once available.

5. **Section 63.04(a)(10) - A statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure:**

   Not applicable.

6. **Section 63.04(a)(11) - Identification of any separately filed waiver requests being sought in conjunction with the transaction:**

   Not applicable.

7. **Section 63.04(a)(12) - A statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets:**

   The Company is a reseller of innovative and cost-effective international telecommunication services. The approval of the transfer of control will serve the public interest, convenience and necessity by allowing the Company to continue providing uninterrupted services to its customers at competitive rates. The availability of the Company's services help to increase competition and reduce prices in the international telecommunications services markets. The transfer of control will not serve to reduce or eliminate competition in domestic markets.