

The instant filing is to notify the Federal Communications Commission of a pro forma 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 October 23, 2010 (the "2010 Transaction"). Specifically, the pro forma transfer of control involved an assignment of ownership interest in Stanacard from Michael Choupak ("Transferor" or "Choupak") to Anastasia Koroleva ("Transferee" or "Koroleva").

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:

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In response to 47 C.F.R. § 63.18(d):

The Transferor and Transferee, both individuals, have not previously received authority under Section 214 of the Act. 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.

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:

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

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.

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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 The instant notification is with respect to the 2010 Transaction.

Subsequently, Choupak assigned the remainder of his 4000 Class A Units and approximately 44.44% ownership interest to Koroleva 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. Stanacard has requested Commission approval for the substantial transfer of control resulting from the 2011 Transaction in a separate application.⁴

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).

⁴ See File No. ITC-T/C-20120116-00003.