

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Stanacard LLC, )  
 )  
Anastasia Koroleva, )  
 )  
                  *Transferor,* )  
and )  
 )  
Michael Choupak, )  
 )  
                  *Transferee.* )  
 )  
Joint Application for Consent to Transfer )  
International and Domestic Authority Pursuant to )  
Section 214 of the Communications Act of 1934, )  
as amended )

File No. \_\_\_\_\_

**JOINT APPLICATION FOR CONSENT TO TRANSFER INTERNATIONAL  
AND DOMESTIC AUTHORITY PURSUANT TO SECTION 214 OF  
THE COMMUNICATIONS ACT OF 1934, AS AMENDED**

Pursuant to Section 214 of the Communications Act of 1934, as amended (the “Communications Act”), 47 U.S.C. § 214, and Sections 63.03, 63.04 and 63.24 of the Commission’s Rules, 47 C.F.R. §§ 63.03, 63.04 and 63.24, Anastasia Koroleva and Michael Choupak (together, the “Applicants”) hereby request consent to the transfer of control of Stanacard, LLC (“Stanacard”) from Ms. Koroleva to Mr. Choupak. Stanacard is a non-dominant carrier authorized by the Commission to provide international and domestic telecommunications services. The Applicants seek streamlined processing of this Joint Application pursuant to Sections 63.03(b)(2) and 63.24(g) of the Commission’s Rules. This Joint Application is being filed simultaneously with the International Bureau and the Wireline Competition Bureau.

In support of this Joint Application, the Applicants respectfully submit the following information:

### **Background**

Stanacard is a privately-held company organized under the laws of the state of Delaware. Stanacard principally offers competitive prepaid interexchange services. Stanacard holds both international and domestic Section 214 authorizations.<sup>1</sup>

Stanacard has a market share in the interstate, interexchange market of less than ten percent (10%) and is not dominant with respect to any service. The proposed transaction will not result in any change in the market share of Stanacard. Consequently, this Joint Application is entitled to streamlined treatment pursuant to Section 63.03(b)(2)(i) of the Commission's Rules.

### **Description of the Transaction**

This transaction contemplates the transfer of control of Stanacard via the transfer of limited liability interests in the company from Ms. Koroleva to Mr. Choupak pursuant to a divorce settlement between the parties. As a result of this transfer, Ms. Koroleva's interest will be reduced from approximately 89% of the company to zero, and Mr. Choupak's interest in the company will increase from zero to approximately 89%. The remaining 11% of the company will continue to be held by its current owner, Eduard Romanov.

### **Qualification for Streamlined Processing**

Stanacard, Ms. Koroleva and Mr. Choupak affirm that (a) the proposed transaction will result in Stanacard having a market share in the interstate, interexchange marketplace of less than 10%; (b) following the proposed transaction Stanacard will not provide any

---

<sup>1</sup> See File No. ITC-214-20090624-00301, granted February 25, 2010; File No. ITC-T/C-20120215-00051, granted Feb. 23, 2012; Public Notice, WC Docket No. 12-18, 27 FCC Rcd 2381 (rel. Mar. 9, 2012) (granting transfer of control of Stanacard from Mr. Choupak to Ms. Koroleva); and File No. ITC-T/C-20120116-00003, granted Mar. 2, 2012.

competitive telephone exchange service or exchange access services; and (c) none of the Applicants is dominant with respect to any service. Consequently, this transaction qualifies for streamlined processing under Section 63.03(b)(2)(i) of the Commission's Rules.

**Transfer of International Section 214 Authorization**

In accordance with the requirements of Section 63.24(e) of the Commission's Rules, Applicants submit the following information:

**(1) Name, address and telephone number of each Applicant:**

**Transferor:**

Anastasia Koroleva  
424 West 33<sup>rd</sup> Street, Suite 410  
New York, New York 10001-2651

**Transferee**

Michael Choupak  
424 West 33<sup>rd</sup> Street, Suite 410  
New York, New York 10001-2651

**(2) Government, state or territory under the laws of which each corporate or partnership Applicant is organized:**

Stanacard is a Delaware limited liability company.

**(3) Name, title, post office address, and telephone number of the officer or contact point of each Applicant to whom correspondence concerning the Joint Application is to be addressed:**

For the Transferor:

Anastasia Koroleva  
424 West 33<sup>rd</sup> Street, Suite 410  
New York, New York 10001-2651  
Tel: (212) 931-6591

For the Transferee:

J.G. Harrington  
Dow Lohnes P.L.L.C.  
1200 New Hampshire Avenue, NW  
Suite 800  
Washington, DC 20036  
Tel. (202) 776-2818  
Fax (202) 776-2222

**(4) Statement as to whether the Applicants have previously received authority under Section 214 of the Act.**

Stanacard holds international authority pursuant to File No. ITC-214-20090624-00301, granted February 25, 2010. Ms. Koroleva was authorized to hold control of Stanacard pursuant to authority granted under File No. ITC-T/C-20120116-00003 and WC Docket No. 12-18, and File No. ITC-T/C-20120215-00051.

Mr. Choupak, the transferee, does not hold any authority under Section 214.

**(5) Name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent of the equity of the Transferee:**

Because Mr. Choupak, the Transferee, is an individual, this question is not applicable to him. The following is the required information for the owners of Stanacard after completion of the transaction:

<u>Name and Address</u>	<u>Percentage Ownership</u>	<u>Citizenship</u>	<u>Principal Business</u>
Michael Choupak 424 West 33 <sup>rd</sup> Street, Suite 410 New York, New York 10001-2651	88.88%	US	Technology
Eduard Romanov 424 West 33 <sup>rd</sup> Street, Suite 410 New York, New York 10001-2651	11.11%	US	Technology

**(6) Certification as to whether or not Transferee is, or is affiliated with, a foreign carrier:**

Mr. Choupak certifies he is not and will not be a foreign carrier, and that neither he nor any affiliate or successor is or will be affiliated with any foreign carrier. Stanacard is not and will not be a foreign carrier, and neither Stanacard nor any affiliate or successor is or will be affiliated with any foreign carrier.

**(7) Certification as to whether or not Transferee seeks to provide international telecommunications services to any country for which certain conditions are true:**

Mr. Choupak certifies that neither he nor any affiliate or successor will provide international telecommunications to any destination country for which Stanacard or an affiliate or successor (1) is a foreign carrier in that country; (2) controls a foreign carrier in that country; or (3) is owned more than 25% by or controlled by an entity that controls a foreign carrier in that country.

**(8) Showing regarding provision of international telecommunications service to a country where the Transferee is a foreign carrier or is affiliated with a foreign carrier.**

Not applicable.

**(9) Regulatory classification under Section 63.10 of the Rules for foreign-affiliated carrier.**

Not applicable.

**(10) Certification that Transferee has not agreed to accept special concessions directly or indirectly from any foreign carrier.**

Mr. Choupak certifies that he has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any US international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.

**(11) Certification by Transferee pursuant to 47 C.F.R. §§ 1.2001-1.2003 that no party to the Joint Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 583**

Mr. Choupak hereby certifies, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of his knowledge, information, and belief, no party to this Joint Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 583.

**(12) Qualification for streamlined processing.**

This Joint Application qualifies for streamlined processing under Sections 63.12(a) and (b) of the Commission's rules. No Applicant is affiliated with any foreign carrier in any destination market. No Applicant has an affiliation with a dominant U.S. carrier. No Applicant seeks authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines. Authorization is sought for the transfer of control of Stanacard from Ms. Koroleva to Mr. Choupak.

## Transfer of Domestic Section 214 Authorizations

Pursuant to Section 63.04(b) of the Commission's Rules, the Applicants supply the following information required pursuant to Sections 63.04(a)(6) through 63.04(a)(12) of the Commission's Rules:

### **(1) Description of the transaction**

This transaction contemplates the transfer of control of Stanacard via the transfer of limited liability company interests from Ms. Koroleva to Mr. Choupak. Following the transaction, Mr. Choupak will own approximately 89 percent of the limited liability company interests in Stanacard.

### **(2) 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**

Ms. Koroleva currently controls Stanacard, which provides service as a prepaid interexchange provider across the United States. Mr. Choupak is not currently a provider of telecommunications services and does not own or operate any providers of domestic telecommunications services.

### **(3) Statement as to how the Joint Application fits into one or more of the presumptive streamlined categories in Section 63.03 of the Commission's Rules or why it is otherwise appropriate for streamlined treatment:**

Stanacard and Mr. Choupak affirm that (a) the proposed transaction will result in Stanacard and Mr. Choupak having a market share in the interstate, interexchange marketplace of less than ten (10) percent; (b) following the proposed transaction Stanacard will not provide competitive telephone exchange service and exchange access services; and (c) none of the applicants is dominant with respect to any service. Consequently, this transaction qualifies for streamlined processing under Section 63.03(b)(2)(i) of the Commission's Rules.

The proposed transaction will have no adverse effect on competition. Grant of streamlined treatment for this Application is consistent with Commission precedent.

### **(4) Identification of all other Commission applications related to the same transaction**

This transaction will not result in the transfer of control of any other authorizations.

### **(5) Statement of whether the Applicants are requesting special consideration because either party to the transaction is facing imminent business failure**

No Applicant is facing imminent business failure. Therefore, the Applicants are not requesting special consideration for this reason.

**(6) Identification of any separately filed waiver requests being sought in conjunction with the transaction**

No separately filed waiver requests are being sought in conjunction with the transaction.

**(7) Statement showing how grant of the Joint 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 proposed transfer of Stanacard from Ms. Koroleva to Mr. Choupak will enable the continued provision of high-quality communications services to Stanacard's customers and will ensure continuity in the operations of the company, as Mr. Choupak previously was involved in the operations of Stanacard. As the proposed transaction involves the transfer of control of Stanacard to an individual who does not hold any telecommunications interests, competition will not be adversely affected by consummation of the proposed transaction.

**Conclusion**

For the foregoing reasons, the Applicants respectfully submit that grant of this Joint Application by the Commission would serve the public interest, convenience and necessity.

Respectfully submitted,

Michael Choupak

By: 

\_\_\_\_\_  
J.G. Harrington  
His Counsel  
Dow Lohnes P.L.L.C.  
1200 New Hampshire Avenue, NW  
Washington, DC 20036  
(202) 776-2818  
jharrington@dowlohnesc.com

Anastasia Koroleva

By: 

\_\_\_\_\_  
Anastasia Koroleva  
424 West 33<sup>rd</sup> Street, Suite 410  
New York, New York 10001-2651

Date: March 20, 2013



**JOINT INTERNATIONAL AND DOMESTIC SECTION 214 APPLICATION**

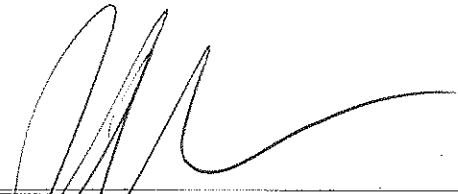
**CERTIFICATION OF MICHAEL CHOUPAK**

I, Michael Choupak, hereby certify the following:

- I am not a foreign carrier, nor is Stanacard, LLC ("Stanacard") a foreign carrier, nor am I or Stanacard affiliated with any foreign carrier, within the meaning of Sections 63.18(i) and 63.09(d) and (e) of the rules of the Federal Communications Commission. 47 C.F.R. §§ 63.18(i), 63.09(d), (e);
- I do not seek and Stanacard does not seek to provide international telecommunications services to any destination country to which paragraphs (j)(1)-(4) of Section 63.18 of the Commission's rules apply;
- I and Stanacard have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future; and
- No party to this application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 18, 2013

  
\_\_\_\_\_  
Michael Choupak