

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

In the Matter of)
)
Roman LD, Inc.)
)
Sapina Quayum,)
)
Transferor,)
and)
)
Monotaz Begum)
)
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, Sapina Quayum (“Transferor”) and Monotaz Begum (“Transferee”) (together, the “Applicants”) hereby request *nunc pro tunc* approval to transfer control of Roman LD, Inc. (“Roman”) from Ms. Quayum to Ms. Begum. Roman 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) and 63.12 of the Commission’s Rules. This Joint Application is being filed concurrently with the International Bureau and the Wireline Competition Bureau.

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

Background

Roman is a privately-held company organized under the laws of the state of Texas. Roman is a non-facilities-based interexchange carrier that provides domestic and international long distance telecommunications service on a purely resold basis. Roman holds both international and domestic Section 214 authorizations.¹

Roman 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 transaction did not result in any change in the market share of Roman. Moreover, both Applicants are individuals; in other words, the Applicants are not telecommunications providers or facilities-based carriers. Consequently, this Joint Application is entitled to streamlined treatment pursuant to Sections 63.03(b)(2)(i) and 63.03(b)(1)(i) & (ii) of the Commission's Rules.

Description of the Transaction

This transaction involves the transfer of control of Roman via the transfer of shares of capital stock of the company from Transferor to Transferee pursuant to a stock purchase agreement. As a result of this transfer, Transferor's interest has been reduced from 100% to zero, and Transferee's interest in the company increased from zero to 100%. As this transaction was consummated in January of 2013 without prior Commission approval, Applicants are requesting *nunc pro tunc* approval of the transfer of control. Applicants recognize that any action on this Joint Application is without prejudice to any action the Commission may take on other matters.

¹ File No. ITC-214-20110512-00132, granted June 10, 2011.

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:

Ms. Sapina Quayum
3550 Wilshire Blvd 17th Floor
Los Angeles, CA 90010
213-381-7160

Transferee:

Ms. Monotaz Begum
2300 Valley View Lane, Ste. 730
Irving, TX 75062-1780
972-746-2004

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

Roman is organized under the laws of the state of Texas. The Applicants are individuals.

(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:
Ms. Sapina Quayum
3550 Wilshire Blvd 17th Floor
Los Angeles, CA 90010
213-381-7160

For the Transferee:
Mr. Cheng-yi Liu
Member
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100
Arlington, VA 22209
703-812-0400

Mr. Robert Schill

Of Counsel
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100
Arlington, VA 22209
703-812-0400

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

Roman holds international authority pursuant to File No. ITC-214-20110512-00132, granted June 10, 2011.

Neither Applicant, as individuals, has ever received 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:

Ms. Begum, the Transferee, owns 100% of Roman.

Ms. Monotaz Begum
2300 Valley View Lane, Ste. 730
Irving, TX 75062-1780
Citizenship: U.S.
Principal Business: Telecommunications

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

Transferee certifies she is not a foreign carrier, and that neither she nor any affiliate is affiliated with any foreign carrier. Roman is not a foreign carrier, and neither Roman nor any affiliate is 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:

Transferee certifies that she does not seek to provide international telecommunications to any destination country for which Transferee (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; (4) is in a joint venture or market alliance with two or more foreign carriers (or parties that control foreign carriers) who own in the aggregate more than 25% of the Section 214 holder.

(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.

Transferee certifies that she has 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.

(11) Explanation for Answer to Question 22:

Applicant is unable to certify "yes" to this question because the 2013 Transaction was consummated without prior Commission approval on January 2, 2013.

(12) 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.

Transferee hereby certifies, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of her 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.

(13) 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 Roman from Transferor to Transferee.

Transfer of Domestic Section 214 Authorization

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.

Please refer to the description of the transaction provided above.

(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.

Roman provides resold competitive, non-facilities-based, interexchange telecommunications services in various states, including: Alabama, Arkansas, Colorado, Florida, Georgia, Kansas, Kentucky, Louisiana, Massachusetts, Minnesota, Nevada, New Hampshire, New York, North Carolina, Oklahoma, Pennsylvania, South Carolina, Texas, Utah, and Washington. Prior to this transaction, Ms. Begum was not a provider of telecommunications services and did 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.

Roman and Transferee affirm that (a) the transaction resulted in Roman and Transferee having a market share in the interstate, interexchange marketplace of less than ten (10) percent; (b) following the transaction Roman has not and 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) and 63.03(b)(1)(i) & (ii) 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 did 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 transfer of Roman from Transferor to Transferee enables the continued provision of high-quality communications services to Roman's customers. As the transaction involves the transfer

of control of Roman to an individual who does not hold any other telecommunications interests, competition will not be adversely affected.

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,

/s/

Cheng-yi Liu

Robert Schill

Counsel to Roman LD, Inc.

Fletcher, Heald & Hildreth, PLC

1300 N. 17th Street

11th Floor

Arlington, VA 22209

703-812-0400

July 22, 2015

CERTIFICATION OF MONOTAZ BEGUM

I, Monotaz Begum, hereby certify the following:

- All statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
- I am not a foreign carrier, nor is Roman LD, Inc. ("Roman") a foreign carrier, nor am I or Roman 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) and (e);
- I do not seek and Roman 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 Roman 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 that the foregoing is true and correct.

Executed on: 7/13/15

Monotaz Begum
Monotaz Begum