



Internet  
Voice  
Cloud Services  
IT Services  
Data Center Colocation  
DirectTV

June 17, 2021

**CONFIDENTIAL DOCUMENTS ENCLOSED**

Mr. Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: FPSC Docket No. 20210108-TP  
2022 State Certification §54.313 and §54.314 – Annual Reporting Requirements for  
High-cost Recipients and Certification of Support for Eligible Telecommunication Carriers

Dear Mr. Teitzman:

Enclosed for filing in the above referenced docket is the signed Affidavit of Bruce Russell on behalf of ITS Telecommunications Systems, Inc. d/b/a ITS Fiber certifying that all federal high cost support received by ITS Telecommunications Systems, Inc. d/b/a ITS Fiber in 2022 will only be used for the provisioning, maintenance, and upgrading of facilities and services for which such support is intended.

ITS Telecommunications Systems, Inc. d/b/a ITS Fiber respectfully requests that the Florida Public Service Commission file the annual certification regarding the federal high-cost support with the Federal Communications Commission (FCC) and the Universal Service Administration Company (USAC) pursuant to 47 CFR § 54.314.

Please contact Donna Marreel at 772-597-3161 if you have any questions regarding this filing.

Sincerely,

A handwritten signature in blue ink that reads "Bruce Russell". The signature is stylized and cursive.

Bruce Russell  
Vice President of Finance

Enclosure

**AFFIDAVIT**

STATE OF FLORIDA  
COUNTY OF MARTIN

My name is Bruce Russell. I am employed by ITS Telecommunications Systems, Inc. d/b/a ITS Fiber ("ITS Fiber" or the "Company") as Vice President of Finance. I possess substantial knowledge of the Company's operations and am an officer authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the certification of the Florida Public Service Commission ("Commission") as contemplated in 47 C.F.R. §54.313 and §54.314.

ITS Fiber hereby certifies that all federal high-cost support was used in the preceding calendar year, and will utilize it during 2022, only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. §254(e) of the Telecommunications Act of 1996.

ITS Fiber hereby certifies that it follows appropriate procedures for network outage reporting as per the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2020 and March 1, 2021, ITS Fiber did not have any Federal FCC or Florida Public Service Commission reportable outages.

ITS Fiber hereby certifies that it did fulfill all requests for service from potential customers.

ITS Fiber hereby certifies that it received zero (0) FCC complaint during the period of March 1, 2020 through March 1, 2021. ITS Fiber received zero (0) complaints filed with the FPSC during the period March 1, 2020 to March 1, 2021.

ITS Fiber hereby certifies that it complies with the applicable state PSC quality of service standards and state consumer protection rules in accordance with Florida Statutes and the Florida Administrative Code.

FPSC Docket No. 20210108-TP  
2022 State Certification §54.313 and §54.314 – Annual Reporting Requirements for  
High-cost Recipients and Certification of Support for Eligible Telecommunication Carriers

BEFORE ME, the undersigned authority, personally appeared Bruce Russell, known to me to be a credible person and of lawful age, who deposed and said:

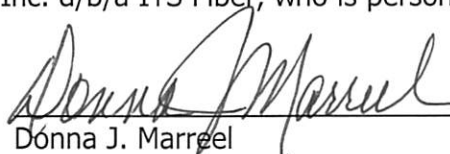
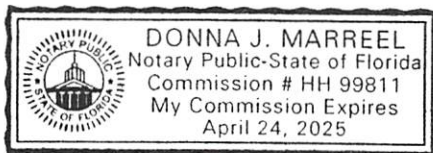
**FURTHER AFFIANT SAYETH NOT.**



\_\_\_\_\_  
Bruce Russell  
Vice President of Finance

STATE OF FLORIDA  
COUNTY OF MARTIN

Acknowledged before me this 17th day of June, 2021 by Bruce Russell, as Vice President of Finance with ITS Telecommunications Systems, Inc. d/b/a ITS Fiber, who is personally known to me and did not take an oath.

  
\_\_\_\_\_  
Donna J. Marreel  
Notary Public

Personally known ✓  
Produced Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_