

**Eric Fryson**

**From:** Tanea Foglia [TFoglia@jsitel.com]  
**Sent:** Monday, July 02, 2012 3:28 PM  
**To:** Filings@psc.state.fl.us

**Attachments:** ITS.pdf

A	Tanea Foglia Manager – Regulatory Affairs John Staurulakis Inc. 7852 Walker Drive, Suite 200 Greenbelt Maryland, 20770 Office: 301-459-7590 <a href="mailto:tfoglia@jsitel.com">tfoglia@jsitel.com</a>
B	Undocketed
C	ITS Telecommunications Systems, Inc. – SAC 210331
D	5 pages
E	2012 annual eligible telecommunications carrier report on behalf of ITS Telecommunications Systems, Inc. pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Federal Communications Commission’s rules (47 C.F.R. § 54.313) and as specified in the Public Notice released on May 8, 2012 (DA 12-729).

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7/2/2012

04415 JUL -2 2  
 FPSC-COMMISSION CLERK



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June 28, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: WC Docket No. 10-90  
2012 Annual Eligible Telecommunications Carrier Report  
ITS Telecommunications Systems, Inc.**

Dear Ms. Dortch:

John Staurulakis, Inc. respectfully files the enclosed 2012 annual eligible telecommunications carrier report on behalf of ITS Telecommunications Systems, Inc. pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Federal Communications Commission's rules (47 C.F.R. § 54.313) and as specified in the Public Notice released on May 8, 2012 (DA 12-729). Copies will also be provided to USAC and the relevant state commission.

Also attached is a letter requesting confidential treatment of the Company's ETC Annual Report under Section 0.459 of the Commission's rules, 47 C.F.R. § 0.459. Additionally, the document contains appropriate indications respecting confidentiality.

Please contact the undersigned if you have any questions.

Sincerely,

John Kuykendall, Vice President  
Authorized Representative for  
ITS Telecommunications Systems, Inc.

Enclosure

04415 JUL-2 2012  
FPC-COMMISSION CLERK

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
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6849 Peachtree Dunwoody Road  
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phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124

ETC Annual Reporting Requirements 47 CFR §54.313(a)(2) through (a)(6)

**Section 1: Certification Required For ALL Recipients of High Cost Support (ILECs and CETCs)**

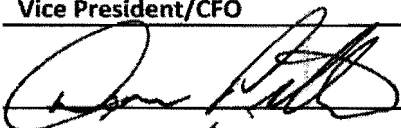
Section 54.313(a)(5)-(6) of the rules of the Federal Communications Commission ("FCC") requires ITS Telecommunications Systems, Inc. (the "Company") to be able to make certifications regarding service quality standards and consumer protection rules and the Company's ability to function in emergency situations. The Company makes these certifications below

I, **Don Pittman** am an officer of ITS Telecommunications Systems, Inc. and hereby certify:

- That the Company is complying with applicable service quality standards and consumer protection rules.
- That the Company is able to function in emergency situations as set forth in §54.202(a)(2).<sup>1</sup>

Name of Officer (Print): Don Pittman

Title: Vice President/CFO

Signature: 

Date: 6/28/12

<sup>1</sup> Section 54.202(a)(2) requires ETCs to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

**ETC Annual Reporting Requirements 47 CFR §54.313(a)(2) through (a)(6)**

**Section 2: State-Designated ETC Reporting**

In its *Clarification Order*, the FCC required state-designated ETCs that are subject to a state requirement to report to the state some or all of certain information annually, to file a copy of any relevant information with the FCC in 2012.<sup>2</sup> Specifically, state-designated ETCs must file information concerning outages, unfulfilled requests, and complaints as required in Section 54.313(a)(2)-(4) of the FCC's rules if the state requires ETCs to report some or all of this data.

**ITS Telecommunications Systems, Inc.** is located in **Florida**. This state commission's rules **do** require state-designated ETCs to file an annual report containing some or all of the following information: information concerning outages, unfulfilled requests and/or complaints. Pursuant to the *Clarification Order*, below is the relevant information that the Company provided in its most recent annual report.

**1. §54.313(a)(2): Service Outages**

The Company had zero service outages in 2011.

**2. §54.313(a)(3): Unfulfilled Service Requests**

The Company had zero unfulfilled service requests in 2011.

**3. §54.313(a)(4): Service Complaints**

Zero service complaints were made about The Company to the FCC or state commission in 2011.

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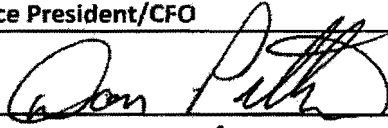
<sup>2</sup> *Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *High-Cost Universal Service Support*, WC Docket No. 05-337, *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link-Up*, WC Docket No. 03-109, *Universal Service – Mobility Fund*, WT Docket No. 10-208, Order, DA 12-147 (rel. Feb. 3, 2012) ("*Clarification Order*") at para. 10

ETC Annual Reporting Requirements 47 CFR §54.313(a)(2) through (a)(6)

Certification of Officer as to the Statements Made Above and Accuracy of Any Data Provided  
Concerning Outages, Unfulfilled Requests, and/or Complaints

Name of Officer (Print): Don Pittman

Title: Vice President/CFO

Signature: 

Date: 6/28/12

## Your submission has been accepted

ECFS Filing Receipt - Confirmation number: 2012628572282

### Proceeding

Name	Subject
10-90	In the Matter of Connect America Fund A National Broadband Plan for Our Future High-Cost Universal Service Support.

### Contact Info

Name of Filer: ITS Telecommunications Systems, Inc.  
Attorney/Author Name: John Kuykendall  
Lawfirm Name (required if represented by John Staurulakis, Inc. counsel):

### Address

Address For: Filer  
Address Line 1: 7852 Walker Drive Suite 200  
City: Greenbelt  
State: MARYLAND  
Zip: 20770

### Details

Type of Filing: REPORT

### Document(s)

File Name	Custom Description	Size
ITS Transmittal.pdf		43 KB
ITS ETC Cert.pdf		632 KB

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